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June 19, 2003

03-138

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JUN 19 2003

Federal Communications Commission
Office of the Secretary

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Room CY-B-402
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application by SBC Communications Inc., et al., for Provision of In-Region,
InterLATA Services in Michigan

Dear Ms. Dortch:

We are enclosing the supplemental filing of the Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan. Because SBC is submitting confidential information, we are filing confidential and redacted versions of the supplemental filing.

Consistent with the Commission's prior orders and practice, this supplemental filing incorporates in its entirety SBC's initial Application to provide long-distance service in Michigan, WC Docket No. 03-16 (filed Jan. 16, 2003), as well as all of SBC's submissions (e.g., comments, reply comments, and ex parte letters) filed in WC Docket No. 03-16. This supplemental filing includes additional material and affidavits to be added to the record already created in WC Docket No. 03-16.

1. The Application consists of (a) a stand-alone document entitled "Supplemental Brief in Support of Application by SBC for Provision of In-Region, InterLATA Services in Michigan" (the "Supplemental Brief"), and (b) supporting documentation. The supporting documentation is organized as follows:

- a. Supplemental Appendix A includes affidavits and attachments thereto in support of the complete application; and

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- b. Supplemental Appendices C, E, H, I, J, K & L, consisting of additional record material;
2. We are submitting the following material:
 - a. One original and one copy of the redacted supplemental filing (in paper form);
 - b. One original of only the portions of the supplemental filing that contain confidential information;
 - c. Two CD-ROM sets containing the redacted supplemental filing; and
 - d. Four additional copies of the redacted supplemental filing (partly in paper form, partly on CD-ROM, in accordance with the Commission's filing requirements), so that each Commissioner may receive a copy.
3. We are also providing to you copies of this letter and of portions of the supplemental filing for date-stamping purposes. Please date-stamp and return these materials.
4. Under separate cover, we are providing the Wireline Competition Bureau with 20 copies of the Supplemental Brief and 20 copies of the redacted Supplemental Appendix A in paper form, as well as 20 CD-ROM versions of the complete redacted supplemental filing. Furthermore, we are submitting to the Bureau one copy in paper form of only those portions of the supplemental filing that contain confidential information. We are also submitting one copy of this cover letter and one copy of the redacted supplemental filing in paper form to Layla Seirafi-Najar, U.S. Department of Justice, 1401 H Street, N.W., Suite 8000, Washington, D.C. 20530. In addition, we are providing the Department of Justice with eight copies of the Supplemental Brief, eight copies of Supplemental Appendix A in paper form (with eight copies of the proprietary portions), and eight CD-ROMs containing the complete redacted supplemental filing. Finally, we are submitting a copy of the complete redacted supplemental filing in paper form to Qualex (the Commission's copy contractor).

All inquiries relating to access to confidential information submitted by SBC in support of this Application (subject to the terms of any applicable protective order) should be addressed to:

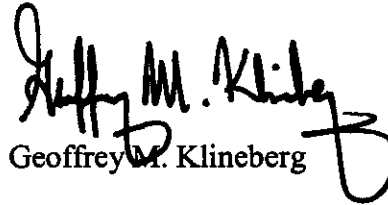
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Marlene H. Dortch
June 19, 2003
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Thank you for your kind assistance in this matter. If you have any questions, please call me at 202-326-7928.

Sincerely,


Geoffrey M. Klineberg

Enclosures

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Application by SBC Communications Inc.,
Michigan Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in Michigan

WC Docket No. 03-_____

To: The Commission

**SUPPLEMENTAL BRIEF
IN SUPPORT OF APPLICATION BY SBC FOR
PROVISION OF IN-REGION, INTERLATA SERVICES IN MICHIGAN**

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ATTACHMENTS

Attachment 1:	Required Statements
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Supplemental Appendix A: Affidavits

- Tab 1. Scott J. Alexander
(ISP Terminating Compensation)**
- Tab 2. Justin W. Brown/Mark J. Cottrell/Michael E. Flynn
(Wholesale Billing)**
- Tab 3. Mark J. Cottrell/Beth Lawson
(Change Management/Additional OSS Issues)**
- Tab 4. James D. Ehr
(Performance Measures)**
- Tab 5. James D. Ehr/Salvatore T. Fioretti
(Third-Party Performance Evaluations)**
- Tab 6. Deborah O. Heritage
(Supplemental Track A Data)**
- Tab 7. Brian Horst
(Ernst & Young Billing Verifications)**

**Supplemental Appendix C: Additional Selected Portions of the Record in Case No. U-12320
(271 Proceeding)**

**Supplemental Appendix E: Additional Selected Portions of the Record in Case No. U-11830
(Performance Measures Proceeding)**

Supplemental Appendix H: SBC Midwest Region CLEC Accessible Letters (CLECAM)

Supplemental Appendix I: SBC 13-State Region CLEC Accessible Letters (CLECALL)

Supplemental Appendix J: SBC Midwest Region CLEC OSS Accessible Letters (CLECAMS)

Supplemental Appendix K: SBC 13-State Region CLEC OSS Accessible Letters (CLECALLS)

Supplemental Appendix L: Additional Selected Documents

GLOSSARY OF 271 ORDERS

<u>Arkansas/Missouri Order</u>	<u>Joint Application by SBC Communications Inc., et al., Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri</u> , Memorandum Opinion and Order, 16 FCC Rcd 20719 (2001), <u>aff'd</u> , <u>AT&T Corp. v. FCC</u> , No. 01-1511, 2002 WL 31558095, 50 Fed. App. 453 (D.C. Cir. Nov. 18, 2002) (<u>per curiam</u>)
<u>BellSouth Five-State Order</u>	<u>Joint Application by BellSouth Corporation, et al., for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina</u> , Memorandum Opinion and Order, 17 FCC Rcd 17595 (2002)
<u>Georgia/Louisiana Order</u>	<u>Joint Application by BellSouth Corporation, et al., for Provision of In-Region, InterLATA Services in Georgia and Louisiana</u> , Memorandum Opinion and Order, 17 FCC Rcd 9018 (2002)
<u>Kansas/Oklahoma Order</u>	<u>Joint Application by SBC Communications Inc., et al., for Provision of In-Region, InterLATA Services in Kansas and Oklahoma</u> , Memorandum Opinion and Order, 16 FCC Rcd 6237 (2001), <u>aff'd in part and remanded</u> , <u>Sprint Communications Co. v. FCC</u> , 274 F.3d 549 (D.C. Cir. 2001)

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Application by SBC Communications Inc.,
Michigan Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in Michigan

WC Docket No. 03-_____

To: The Commission

**SUPPLEMENTAL BRIEF
IN SUPPORT OF APPLICATION BY SBC FOR
PROVISION OF IN-REGION, INTERLATA SERVICES IN MICHIGAN**

INTRODUCTION AND EXECUTIVE SUMMARY

In its January 2003 Application to provide long-distance service in Michigan, SBC Communications Inc. and its subsidiaries Michigan Bell Telephone Company ("Michigan Bell") and Southwestern Bell Communications Services, Inc. ("SBCS") – collectively, "SBC" – made a comprehensive showing that its local market is open to competition, that its overall checklist performance is excellent, and that its Application should therefore be approved. After undertaking exhaustive reviews over many years, the Michigan Public Service Commission ("Michigan PSC" or "MPSC") enthusiastically supported SBC's Application. The MPSC concluded without reservation that SBC had fulfilled all requirements for section 271 approval. In the course of this Commission's 90-day review period, however, the Commission's Staff raised several discrete questions that SBC could not fully resolve within the statutory timeframe.

SBC withdrew its Application on April 16, 2003, and promised to re-file a revised application that would resolve the few remaining issues of concern to the Commission's Staff.¹

SBC has now done exactly that. This supplemental filing marshals significant evidence on each of the few remaining issues. In accordance with the Commission's prior orders, this revised Application adopts all of SBC's filings in support of its initial Application of January 2003 (WC Docket No. 03-16) and focuses here on the small subset of issues that remained unresolved in that proceeding. This supplemental filing picks up where the initial Application left off. At that point, the FCC Staff had identified three principal issues that SBC was unable to address adequately in the time remaining:

First, the Staff expressed concern that BearingPoint's ongoing testing of the performance measurements has reached results that call into question the reliability of the Ernst & Young ("E&Y") audit of those same performance measurements. It is critical to understand that SBC has consistently relied on the E&Y audit – using a methodology that this Commission has accepted numerous times before, see, e.g., Arkansas/Missouri Order ¶ 17 & n.39 – as the third-party verification of the reliability of its performance measurements. The only question is whether, in its ongoing testing of the same performance measurements, BearingPoint is uncovering some material problem with the measurements that E&Y either missed or ignored. The answer is simply "no," and SBC is providing additional evidence to support that answer. See Ehr/Fioretti Joint Supp. Aff. ¶¶ 58-164 & Attachs. B-F (Supp. App. A, Tab 5).

Second, the Staff desired further confirmation that the Change Management Communications Plan ("CMCP") has been successfully implemented in Michigan and that SBC

¹ See Letter from James C. Smith, SBC, to Marlene H. Dortch, FCC, WC Docket No. 03-16 (Apr. 16, 2003).

is complying with it. With this supplemental filing, SBC is providing additional evidence that the CMCP is in place and working effectively to ensure that CLECs are provided appropriate notice whenever SBC performs a CLEC-affecting system modification. See Cottrell/Lawson Joint Supp. Aff. ¶¶ 18-38 (Supp. App. A, Tab 3).

Finally, the Staff indicated that it needed additional confirmation that the January 2003 reconciliation of the ACIS (Ameritech Customer Information System) and CABS (Carrier Access Billing System) databases worked as SBC had described and that the UNE-P bills generated by CABS are accurate. SBC engaged E&Y to validate SBC's claims with respect to the reconciliation and regarding the reliability of current UNE-P bills. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 41-107 (Supp. App. A, Tab 2); Horst Supp. Aff. ¶¶ 2-4 & Attachs. A-C (Supp. App. A, Tab 7). Since the withdrawal of the initial Application, SBC has also made a number of discrete improvements to its billing system, and E&Y has validated that these changes were successfully implemented. Moreover, SBC is providing a thorough explanation of outstanding CLEC billing disputes, confirming that SBC's experience with such disputes in Michigan is comparable to its experience in other states that have already received section 271 authority. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 109-165.

In addition to addressing these three specific areas, SBC is also providing additional information regarding line splitting and various OSS issues, including line-loss notifications and post-to-bill notifiers. Finally, SBC is including supplemental affidavits addressing the latest performance measurement data, the current rate structure in Michigan for ISP compensation, and updated Track A information.

* * * *

This supplemental filing provides the additional information that the FCC Staff requested at the end of the original 90-day application period. As Chairman Powell's statement confirms, SBC's original application "generally met the requirements of section 271" and the outstanding issues at the end of the 90-day period "were very narrow, but nonetheless important."² In this supplemental filing, SBC has focused on these narrow issues and has provided additional information confirming that SBC has satisfied the requirements of section 271 in Michigan. Together with the material submitted in WC Docket No. 03-16, this revised Application establishes what the Michigan PSC has repeatedly confirmed – that the local market is irreversibly open to competition, that SBC has satisfied all prerequisites for interLATA relief, and that this Application should be granted.

DISCUSSION

I. PERFORMANCE MEASUREMENTS

As SBC established in the initial Application, Michigan Bell's performance-measurement system has been comprehensively reviewed and verified by E&Y. E&Y's audit of Michigan Bell's performance measures is now entirely complete. See SBC Michigan's Submission of Final Ernst & Young Corrective Action Report (MPSC Apr. 30, 2003) (Supp. App. C, Tab 13); Ehr/Fioretti Joint Supp. Aff. ¶ 34 & Attach. A. E&Y's review of Michigan Bell's performance data was substantially more comprehensive than the audit it conducted on behalf of the Missouri Public Service Commission in 2000 as part of that commission's review of Southwestern Bell's section 271 application in Missouri. See Dolan/Horst Joint Aff. ¶¶ 5-6 (WC Docket No. 03-16)

² Statement of FCC Chairman Michael Powell on Withdrawal of SBC's 271 Application for Michigan at 1, WC Docket No. 03-16 (Apr. 16, 2003), available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-233291A1.doc.

(App. A, Tab 8).³ It is clear, therefore, that, standing alone, the E&Y audit should be more than adequate to satisfy this Commission's interest in having a third-party test of the BOC applicant's performance-measurement processes and results. Any other conclusion would impose a requirement on SBC in this Application that this Commission has never imposed before.

The question, then, is whether it makes any difference to the reliability of SBC's reported performance-measurement results that BearingPoint is continuing to perform its review of the same performance-measurement system that E&Y has already found to be accurate and reliable. The answer is simple. It should not make any difference, unless BearingPoint is uncovering material problems with the way SBC is calculating or reporting significant performance-measurement results that E&Y somehow overlooked or missed in its own review of those same measures. It is not sufficient that BearingPoint occasionally raises a question about a particular measurement or reported result. If the E&Y audit is sufficient, standing alone, to justify reliance on SBC's reported performance-measurement results, then BearingPoint's issuance of an "observation" or "exception" concerning a particular measurement during its on-going and incomplete review cannot overcome an E&Y finding that the result is calculated or reported correctly. BearingPoint issues "observations" and "exceptions" as a means of informing both SBC and the Michigan PSC of issues that may need to be addressed; SBC's response is typically to provide further clarification, to modify its documentation, or to work with BearingPoint to arrive at a common understanding of the issues. See Ehr/Fioretti Joint Supp. Aff. ¶¶ 45-48.

³ See also Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. A at 2 (Mar. 28, 2003) ("SBC's March 28 Ex Parte").

This process does not render the findings of E&Y suspect, especially when BearingPoint has not yet completed its performance-measurement review. It simply reveals a difference in the methodologies and approaches used by E&Y and BearingPoint in reviewing SBC's performance-measurement and reporting system. In any case, BearingPoint is making progress in completing its review, with approximately 46.3% of its test criteria satisfied as of the end of April 2003 compared to only 10.9% as of the end of October 2002. See Ehr/Fioretti Joint Supp. Aff. ¶ 59 (table).

SBC has already explained in detail to the Commission the high correlation in results found by E&Y and BearingPoint, notwithstanding significant differences in their methodologies and approaches. See SBC's March 28 Ex Parte, Attach. A. As SBC elaborated, there were two principal reasons for any differences between the results: (1) Because BearingPoint tests the performance data for a particular set of months, the more recent corrective action that SBC made in response to E&Y findings was often not reflected in the older data that BearingPoint reviewed. Thus, in some instances, BearingPoint is identifying a problem with a performance measure that is no longer a problem, because E&Y had already identified the same problem and SBC took action to correct it. (2) Because BearingPoint applies a 1% materiality standard while E&Y employs a 5% materiality standard, a "problem" identified by BearingPoint might not have registered as a problem for E&Y, because it simply was not deemed to be a material issue. See Ehr/Fioretti Joint Supp. Aff. ¶ 99; SBC's March 28 Ex Parte, Attach. A at 9-10.

SBC has now supplemented the showing it made during the initial proceedings with additional information to demonstrate further that nothing that BearingPoint has found so far calls into question the conclusions of E&Y that Michigan Bell's performance measurements are accurate and reliable. Specifically, SBC has provided a series of new charts that focus on the

snapshot reflected in BearingPoint's April 2003 Draft Report⁴ with respect to the critical performance measurements on which this Commission has historically relied in prior section 271 applications. SBC demonstrates in this supplemental filing that the issues that BearingPoint has identified do not undermine E&Y's conclusions. See id. ¶¶ 58-164 & Attachs. B-F.

A. Metrics Data Integrity Test (PMR4)

In the Metrics Data Integrity Test (PMR4), BearingPoint evaluates the policies and practices used by SBC Midwest, including Michigan Bell, for processing the data used in the production of the reported performance results. See Ehr/Fioretti Joint Supp. Aff. ¶ 101. This test is still ongoing, and, in its April 2003 Draft Report, BearingPoint indicated that 26 out of the 40 test criteria are "Indeterminate," 5 are "Satisfied," while 9 are "Not Satisfied" and in retest. See id. ¶¶ 43, 102. As of the most recent report, BearingPoint has 5 open "exceptions" relating to PMR4, accounting for the 9 PMR4 test points that remain "Not Satisfied." See id. ¶ 104.⁵ In each case, Michigan Bell has responded to BearingPoint, and the issue is "in retest." Moreover, E&Y identified each of the issues raised in these 5 open exceptions, and SBC either has already taken corrective action to address them or has determined that no corrective action is necessary because such action would have no material impact on the reported results. See id. & Attach. B.

Thus, none of the BearingPoint open exceptions (corresponding to the 9 "Not Satisfied" test criteria in the April 2003 Draft Report) for PMR4 calls into question the results of the E&Y audit. Moreover, none of these BearingPoint open exceptions or "not satisfied" test findings in

⁴ BearingPoint's OSS Evaluation Project Report Metrics Update (Apr. 30, 2003) (Supp. App. C, Tab 14) ("April 2003 Draft Report").

⁵ Although BearingPoint identified 6 open exceptions, only 5 of them are applicable to Michigan (Exceptions 134, 175, 176, 181, and 183). The sixth exception – Exception 182 – applies only to Wisconsin. See Ehr/Fioretti Joint Supp. App. ¶ 103 & n.58.

any way undermines the results of the E&Y audit. Likewise, none of these issues has any impact on the reported performance results for February, March, or April 2003. See id. ¶¶ 106-119.

B. Metrics Calculations and Reporting (PMR5)

In the Metrics Calculations and Reporting Test (PMR5), BearingPoint evaluates the processes used by SBC Midwest, including Michigan Bell, to calculate performance results, and it also assesses whether Michigan Bell has appropriately calculated those results in light of the MPSC-approved business rules for each reported measure. See Ehr/Fioretti Joint Supp. Aff.

¶ 120. In its April 2003 Draft Report, BearingPoint has determined that 27 of the 72 applicable test criteria have been “Satisfied,” 12 are “Indeterminate,” and 33 are “Not Satisfied.” See id.

¶ 123. Of those 33, most of them are in retest while others will be resolved through clarification of the business rules through the six-month review collaborative process. See id. ¶ 44.

Within PMR5, there are four test criteria: PMR5-1 tests whether performance measure disaggregations are reported in a manner that is consistent with the business rules; PMR5-2 tests whether BearingPoint can independently replicate the reported performance results by using calculation programs that BearingPoint developed to recalculate Michigan Bell’s unfiltered, unprocessed data; PMR5-3 tests whether Michigan Bell is calculating results consistent with the business rules; and PMR5-4 tests whether Michigan Bell is excluding data consistent with the business rules. See id. ¶ 121.

PMR5-1 has been completely satisfied, see id. ¶ 124. The open observations and exceptions therefore fall into one of the three remaining test criteria.

PMR5-2 involves a process called “blind replication.” Focusing on the performance measurements that the Commission has historically identified as critical for evaluating whether the local market is open to competition, SBC has analyzed BearingPoint’s exceptions and

observations under PMR5-2. BearingPoint has been able to replicate 87.7% of the key measures evaluated so far. See id. ¶ 138. But that number jumps to 96.9% when only “material” differences between the reported and calculated values are considered. See id. ¶ 139.⁶ Because E&Y did not include blind replication as part of its audit of Michigan Bell’s performance measurements, there is no way to compare BearingPoint’s current results on PMR5-2 with E&Y’s findings. Nevertheless, SBC has analyzed the current status of BearingPoint’s blind replication test and, with respect to the critical performance measurements, has explained every occasion where BearingPoint has been unable to replicate SBC’s reported results. See id. ¶¶ 140-144 & Attach. E. BearingPoint’s replication effort will continue for months to come, but the critical point is that nothing that BearingPoint is currently finding calls into question E&Y’s conclusion that these performance measurements are accurate and reliable.

BearingPoint’s testing under PMR5-3 (business rule calculations) and PMR5-4 (business rule exclusions) verifies that SBC Midwest’s reported results are consistent with its documentation and stated objectives. See id. ¶ 145. BearingPoint uses the published business rules as the primary source of documentation and applies a strict, literal interpretation of the business rules in that evaluation. SBC has provided a detailed analysis of each observation and exception identified by BearingPoint issued under either PMR5-3 or PMR5-4. See id. ¶¶ 145-157 & Attach. F (analyzing each observation and exception listed in the “Comments” column of BearingPoint’s PMR5 Status Summary Chart included as Attachment D). With respect to the

⁶ A non-match is “material” if the difference between the reported and calculated results was 5% or greater or if the difference would have caused a change in the originally reported performance result on the Hit or Miss Report – i.e., whether it would have changed a “Hit” for a parity or benchmark measure to a “Miss,” or vice versa. See Dolan/Horst Second Joint Aff. ¶ 18 (WC Docket No. 03-16) (Reply App., Tab 7).

critical performance measurements, BearingPoint has opened a total of 48 observations and one exception relating to PMR5-3 or PMR5-4. SBC's analysis explains that these observations and exceptions generally fall into two categories:

First, they reflect a difference in interpretation of a business rule that may ultimately need to be resolved by the Michigan PSC or through the six-month collaborative review process. Of the 48 observations and one exception listed in Attachment F, 13 relate to differences in interpretation of the business rules. All of these either have already been addressed at the most recent six-month review or are pending review at the next scheduled collaborative. See id. ¶ 151 & nn.86-87.

Second, the observations and exception consist of issues that have already been fixed on a prospective basis but that are not reflected in the July, August, and September 2002 data months that BearingPoint is reviewing. For the 35 observations and one exception not classified as disagreements over the proper interpretations of the business rules,⁷ SBC has already made modifications either to its operational processes or the processing of performance-measurement data to address the associated issue. Sixteen of these observations proved to be material modifications (or at least important to BearingPoint's testing), and SBC restated the data and fixed its processes going forward. Eleven of these observations resulted in changes that were not material, so SBC did not restate the results. And the remaining eight observations (together with the one exception) involved process changes that could only be implemented on a prospective

⁷ One exception – Exception 111 – falls into both the business-rule interpretation category and the prospective-modification category. See Ehr/Fioretti Joint Supp. Aff. ¶ 157 n.91.

basis. None of these issues had any material impact on the February through April 2003 data filed with this revised Application. See id. ¶ 157 & Attach. F.

* * * *

The Michigan PSC concluded back in January 2003 that “sufficient support exists in the completed portions of the BearingPoint test, in the completed portions of the E&Y audit, in the actual market experience and in the responses provided by SBC to BearingPoint’s ongoing investigations to support a Section 271 approval at this time and for reliance” on Michigan Bell’s reported performance metric results.⁸ With this supplemental filing, SBC further confirms the reasonableness of this conclusion.

II. CHANGE MANAGEMENT

As SBC demonstrated in its initial Application, this Commission has already reviewed SBC’s 13-state Change Management Process (“CMP”) (in the Arkansas/Missouri, California, and Nevada 271 proceedings) and found it be checklist compliant. See Cottrell/Lawson Joint Supp. Aff. ¶ 13; Cottrell/Lawson Joint Reply Aff. ¶ 18 (WC Docket No. 03-16) (Reply App., Tab 5). SBC has also demonstrated a pattern of compliance with its CMP. Indeed, as confirmed by SBC’s recent implementation of LSOG 6, that record of compliance has continued through the filing of this revised Application. See Cottrell/Lawson Joint Supp. Aff. ¶¶ 14-17.

⁸ See Report of the Michigan Public Service Commission, In the Matter, on the Commission’s Own Motion, to Consider SBC’s, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320, at 22 (MPSC Jan. 13, 2003) (“Michigan PSC Consultative Report”) (WC Docket No. 03-16) (App. C, Tab 133); see also Michigan PSC Reply Comments at 6, WC Docket No. 03-16 (Mar. 4, 2003) (“Section 271 approval need not be held hostage to completion of these activities which might otherwise result in shortcutting the procedures which are now being pursued.”).

Moreover, SBC continues to work to improve its CMP in ways directly responsive to CLEC concerns. For example, SBC has worked collaboratively with CLECs under the auspices of the Michigan PSC to implement the CMCP, which sets forth a process for providing CLECs with notice of CLEC-impacting programming changes made outside of the normal release schedules. As explained below, the CMCP will ensure that CLECs are provided appropriate notice whenever SBC makes certain programming changes on its side of the interface that could affect the way in which CLECs must operate when communicating with SBC's OSS. See id. ¶¶ 18-38.

A. Compliance With Change Management

SBC has already demonstrated a pattern of compliance with the requirements set forth in the CMP. This record of compliance was most recently confirmed during SBC's implementation of its latest quarterly release – LSOG 6 for pre-ordering (LSPOR version 6.00) and ordering (LSOR version 6.00)⁹ – which was implemented on June 14, 2003, and includes several functionality enhancements over prior LSOG versions. See Cottrell/Lawson Joint Supp. Aff. ¶ 14; id. ¶ 17 (listing enhancements). SBC has complied with all CMP notification, documentation, and testing requirements that apply to the LSOG 6 release. See id. ¶¶ 14-16.

SBC first notified CLECs of the June 2003 implementation of LSOR/LSPOR 6.00 at the May 16, 2002 CMP meeting. See id. ¶ 15. SBC also provided CLECs with a "Release Announcement" more than seven months prior to the scheduled release date. See id. Moreover, SBC provided CLECs with Initial and Final Release Requirements for LSOR/LSPOR 6.00 in

⁹ Local Service Pre-Ordering Requirements ("LSPOR") and Local Service Order Requirements ("LSOR") are requirements developed by SBC Midwest for implementation of the OBF Local Service Order Guidelines ("LSOG"). See Cottrell Aff. ¶ 93 n.42 (WC Docket No. 03-16) (App. A, Tab 6).

accordance with the CMP. See id. As a result of SBC's compliance with the CMP, CLECs have had ample notice and time to prepare for the implementation of LSOR/LSPOR 6.00 and for the corresponding retirement of LSOR 4.02. See id. ¶ 16.

On March 21, 2003, SBC sent an Accessible Letter to remind all CLECs of the upcoming implementation of LSOR 6.00 and retirement of LSOR 4.02 and to urge them to schedule their test windows as early as possible to assist SBC in accommodating their plans. See id. Despite the lengthy notification of the new release and retirement, many CLECs waited until the last minute to conduct joint testing of the new release. See id. SBC has nonetheless made an effort to accommodate and assist these CLECs to test and migrate to newer LSOG versions. See id. For those CLECs that were not completely ready to order services for their end users via EDI by June 16, 2003, CLECs can continue to use SBC's LEX GUI or fax requests to submit LSRs or pre-order inquiries to SBC pending the completion of their migration. See id.

B. Implementation of the Change Management Communications Plan

As discussed above, during the initial Application proceedings, some questions were raised about certain programming changes on SBC Midwest's side of the interface that may have resulted in unintended impacts on CLEC-ordering transactions. See Cottrell/Lawson Joint Supp. Aff. ¶ 18. To address these CLEC concerns, SBC worked collaboratively with CLECs under the auspices of the Michigan PSC and developed processes to provide CLECs with notice of CLEC-impacting programming changes made outside of normal release schedules. See id. ¶¶ 18-38.¹⁰ The resulting notification processes, embodied in the CMCP, were filed with the Michigan PSC

¹⁰ See BellSouth Five-State Order ¶ 182 ("The change management process is designed, by nature, as an evolving one, and we are confident that it is continuing to improve, as evidenced by the changes agreed to by BellSouth, CCP participants, and state commissions.") (footnote omitted).

on March 13, 2003. See id. ¶ 19. As the Michigan PSC explained in its March 26 Order, the CMCP's "additional communication tools can assist greatly in diminishing issues that may arise regarding changes not already specifically addressed in the present 13-state Change Management Process."¹¹ Indeed, had it been in effect, the new CMCP would have addressed many of the CMP compliance issues raised by CLECs during the initial proceedings. See id. ¶ 21.

The CMCP contains a number of measures that respond specifically to CLEC concerns, including: (1) use of an Exception Request Accessible Letter to provide CLECs with notice of new edits for existing business rules and for changes to EDI mapping and CORBA Interface Definition Language ("IDL"); (2) creation and posting on CLEC Online of the Enhanced Defect Report ("EDR"); (3) development and implementation of a training program for SBC personnel; and (4) development and documentation of rigorous methods and procedures for testing of system changes. See id. ¶ 22. These and other measures, which are discussed in detail in the Cottrell/Lawson Joint Supplemental Affidavit, are contained in eight "action plans" within the CMCP; these are in addition to the already existing notification and communication processes contained in the 13-state CMP. See id. See also id. ¶¶ 24-38 (addressing the eight action plans in detail).

On April 30, 2003, SBC filed its first quarterly status report informing the MPSC of SBC's status of implementing and complying with the CMCP. See id. ¶ 23.¹² The status report

¹¹ Opinion and Order, In the Matter, on the Commission's Own Motion, to Consider SBC's, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320, at 4-5 (MPSC Mar. 26, 2003) ("March 26 Order") (Supp. App. C, Tab 9).

¹² Change Management Communications Plan Status Report, In the Matter, on the Commission's Own Motion, to Consider SBC's, f/k/a Ameritech Michigan, Compliance with the

reflected that SBC had completed all “action plan” requirements scheduled for completion within the current reporting period in accordance with the terms of the CMCP. See id. More importantly, the CMCP appears to have addressed CLEC concerns. Since the CMCP was implemented in all 13 SBC states, there have been no new complaints by CLECs (other than those raised in the initial proceeding – all of which previously have been addressed) that interface changes made by SBC outside of the release schedule have caused a previously accepted LSR to be rejected or a previously accepted pre-order transaction to fail. See id. ¶ 38.

III. WHOLESALE BILLING

SBC demonstrated in the original Michigan proceeding that it provides to its wholesale customers accurate, timely, and auditable bills.¹³ In a series of comprehensive, painstaking tests in each of the Midwest states, BearingPoint reviewed SBC Midwest’s wholesale billing systems, interfaces, processes, and procedures, including the systems utilized by SBC Midwest to bill CLECs for wholesale products and services. These wholesale billing systems, processes, and procedures that BearingPoint tested in each of the five states in the SBC Midwest region are the same. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 11-13. Consistent with the requirements of the Master Test Plans developed in each state in collaboration with the CLECs and approved by each of the state commissions, the billing test consisted of a comprehensive processes and

Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (MPSC Apr. 30, 2003) (Supp. App. C, Tab 12).

¹³ See Brown/Cottrell/Flynn Joint Reply Aff. ¶¶ 8-44 (WC Docket No. 03-16) (Reply App., Tab 3); Comments of SBC Pursuant to the Commission’s Public Notice of April 4, 2003, WC Docket No. 03-16 (Apr. 9, 2003); Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. (Apr. 3, 2003) (“SBC’s April 3 Ex Parte”); Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. B (Mar. 14, 2003) (“SBC’s March 14 Ex Parte”).

procedures review (“PPR”) and a complete transaction verification and validation (“TVV”) of the documentation, processes, procedures, and operations of SBC Midwest’s wholesale billing systems.¹⁴ Based upon the results of these five separate, comprehensive, independent third-party billing tests, BearingPoint found that SBC Midwest satisfied 100% (95 of 95) of the applicable test criteria in each test. See id. ¶ 7 & n.12.

After reviewing the BearingPoint report, the Michigan PSC found that SBC Midwest’s billing systems are in full compliance with section 271 requirements. See Michigan PSC Consultative Report at 73-74. During the course of the initial Michigan proceeding, the Michigan PSC repeatedly confirmed that it believed that the billing systems provided accurate and auditable wholesale bills and that it would remain vigilant to guard against any backsliding.¹⁵

The BearingPoint billing tests in the Midwest region began in March 2001 and were, for the most part, completed by the end of 2002 and early 2003. See id. ¶ 15 & nn.21-26. One of the tests that BearingPoint was engaged to perform was to measure whether UNE-P bills reflected the timely posting of UNE-P billing service orders into the billing systems. But

¹⁴ ICC’s Order re. SBC’s Proposed Reorganization (ICC Docket No. 98-0555, Merger Proceeding) (ICC Oct. 5, 1999) (Supp. App. L, Tab 1); IURC’s Order re. Master Test Plan Version 1.0 (IURC Cause No. 41657, 271 Proceeding) (IURC Mar. 19, 2001) (Supp. App. L, Tab 8); MPSC Staff’s Submission of the Ameritech OSS Evaluation Project Master Test Plan, Version 2.0 Dated 08/14/00, Case No. U-12320 (Aug. 16, 2000) (WC Docket No. 03-16) (App. C, Tab 11); PUCO’s Entry re. Master Test Plan (PUCO Docket No. 00-942-TP-COI, 271 Proceeding) (PUCO Dec. 7, 2000) (Supp. App. L, Tab 7); PSCW’s Order re. Master Test Plan Version 2.0, (PSCW Docket No. 6720-TI-160, OSS Proceeding) (PSCW Nov. 29, 2000) (Supp. App. L, Tab 6).

¹⁵ Michigan PSC Reply Comments at 3, WC Docket No. 03-16 (Mar. 4, 2003); Ex Parte Letter from Laura Chappelle, Chairman, Michigan PSC, to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. at 6 (Apr. 2, 2003).

BearingPoint determined that this particular test was one that had to be postponed in light of the commitment that SBC had made to convert all of its UNE-P billing accounts to the CABS database. Between August and October 2001 – that is, in the middle of BearingPoint’s review of the billing systems – SBC was required to undertake this UNE-P CABS conversion, which proved to be an enormously complicated project. See SBC’s April 3 Ex Parte, Attach. at 1-4; Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 25-38. Rather than try to test the timeliness of the posting of UNE-P billing service orders at the same time that UNE-P billing accounts were being converted to CABS, BearingPoint, in consultation with the state commissions and SBC, concluded that it should wait until after the conversion was completed.

When BearingPoint finally tested whether UNE-P billing service orders were being timely posted to CABS and reflected on UNE-P bills in Indiana, Illinois, Ohio, and Wisconsin¹⁶ – between February and March 2002 – the effects from the one-time UNE-P CABS conversion were still being felt. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 21; SBC’s April 3 Ex Parte, Attach. at 6. Not surprisingly, the results of that particular test were poor and led to the issuance of a BearingPoint exception. Throughout the spring and early summer of 2002, however, SBC made a number of critical modifications to its systems and procedures to permit the increasingly timely posting of UNE-P billing service orders into CABS. By the time BearingPoint conducted a retest in Indiana, Illinois, and Wisconsin – from August to October 2002 – SBC easily passed the test.¹⁷ Subsequently, based upon SBC’s representation (and upon its own experience) that

¹⁶ The Michigan PSC decided not to require a retest of this specific test. It determined that it could accept the results from BearingPoint’s retesting of the same systems and processes in the other Midwest states. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 20.

¹⁷ BearingPoint determined that the “Billing Test CLEC’s” UNE-P service order activity was timely posted to the bills 97.1% of the time in Illinois and 100% of the time in both Indiana

the SBC Midwest billing systems and processes are the same, BearingPoint recommended that the results achieved in Illinois, Indiana, and Wisconsin be included in the test results for Ohio and Michigan. See Cottrell/Lawson Joint Supp. Aff. ¶ 11.¹⁸

During the initial Michigan proceeding, parties raised issues concerning the impact of the UNE-P CABS conversion and the subsequent reconciliation of the ACIS and CABS databases. SBC has already discussed both the details of the conversion and the challenges that the conversion presented during the spring and summer of 2002. See SBC's April 3 Ex Parte; Brown/Cottrell/Flynn Joint Reply Aff. ¶¶ 25-38. Although the issues relating to the conversion were substantially resolved by the time that BearingPoint conducted its retesting of the timely posting of UNE-P billing service orders to CABS in the August to October 2002 timeframe (thereby accounting for the remarkable results that BearingPoint achieved on the retest), there remained a number of UNE-P records in CABS that were inconsistent with the corresponding records in ACIS. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 39. As explained to the CLECs, SBC determined that a final reconciliation of the two databases was necessary.¹⁹ That ACIS/CABS reconciliation took place during January 2003, and SBC made corresponding adjustments to the CLEC bills. See id. ¶¶ 39-40.

and Wisconsin. Consequently, BearingPoint determined that the issues raised by its earlier exception had been addressed in a satisfactory manner and that SBC Midwest satisfied this test criterion in these three states. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 23.

¹⁸ BearingPoint's OSS Evaluation Project Report – Final Results on Transaction Verification & Validation and Processes & Procedures Review at 22-24 (MPSC Apr. 30, 2003) (Supp. App. C, Tab 15); BearingPoint's Ohio Interim OSS Status Report at 815-16 (May 23, 2003) (Supp. App. L, Tab 27).

¹⁹ See Accessible Letter CLECAM02-509 (Nov. 21, 2002) (WC Docket No. 03-16) (App. H, Tab 35).

After SBC withdrew its initial Michigan Application, it engaged E&Y to review the reconciliation process to determine whether it was, in fact, performed as SBC had intended and whether the UNE-P bills generated by CABS today are generally accurate and reliable. E&Y has now completed its review and has verified that SBC's methodology used to conduct the reconciliation was implemented appropriately. See Horst Supp. Aff., Attach. B at 4-8; Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 41-64.²⁰ In addition to its thorough validation of the reconciliation, E&Y also validated a statistically valid sample of current circuits to ensure that the records in ACIS and CABS match one another. See Horst Supp. Aff., Attach. B at 8, Attach. C at 7-9. E&Y found that 99% of the CABS records are identical to the corresponding records in ACIS. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 65-66. These results are remarkable, given that SBC has processed more than 1.7 million service orders since the ACIS/CABS reconciliation was completed in January 2003. See id. ¶ 65.²¹

SBC also engaged E&Y to verify the accuracy of the data that SBC presented in its April 3 Ex Parte regarding the percentage of billing service orders that posted mechanically to CABS.

²⁰ E&Y also validated the accuracy of the adjustments to the bills that SBC Midwest made as a result of the reconciliation. Although E&Y found that the adjustments were calculated correctly, it noted some discrepancies in the "effective dates" that SBC utilized to back bill or credit particular CLECs. These discrepancies had nothing to do with the CABS billing system or with the underlying rate tables. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 56. Rather, they were the result of errors in interpreting specific contracts when determining how far back to credit or debit the CLEC's account. As a result of E&Y's review, SBC has undertaken corrective action. See id. ¶ 57. E&Y has validated the accuracy of these corrections. See Horst Supp. Aff., Attach. B at 5-7.

²¹ In order to ensure that the ACIS and CABS databases remain in sync, SBC will propose at the next SBC Midwest Billing collaborative (scheduled for June 26, 2003) the adoption of a new performance measurement to calculate the percent of ACIS UNE-P provisioning records that match the corresponding CABS UNE-P billing records. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 67 & Attach. E.

See SBC's April 3 Ex Parte, Attach. at 5, Table 1. E&Y has validated SBC's data indicating that SBC's mechanized posting of billing service orders improved from 71% in March 2002 to 96% by March 2003. See Horst Supp. Aff., Attach. B at 9, Attach. C at 15-16. With these improvements in mechanized posting, SBC has reduced the potential for error resulting from manual handling and greatly increased the volume of orders that post without the need for local service center ("LSC") intervention. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 70.

SBC has established a comprehensive process for ensuring that the rate tables used to bill its customers are updated in a timely and accurate manner. See id. ¶¶ 73-76. E&Y has now extensively validated the accuracy of SBC Midwest's rating of UNE billing elements, including monthly recurring charges, non-recurring charges, and usage rates from the CLECs' bills through to the applicable interconnection agreement or tariff. See Horst Supp. Aff., Attach. B at 8-9, Attach. C at 12-15, 31-33. As part of its validation, E&Y selected a sample of UNE and UNE-P circuits from the CABS database and tested them to ensure that the rates appearing on those bills accurately reflect the rates that should be charged to the CLEC, based upon the rate tables in CABS and the individual interconnection agreement or tariff applicable to that CLEC. See id., Attach. C at 12-14. For the monthly recurring charges, E&Y tested more than 4,800 USOCs and found an overall accuracy rate of greater than 98.4%. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 81. For non-recurring charges, out of more than 600 USOCs sampled, E&Y found an overall accuracy rate of greater than 98.6%. See id. ¶ 83. With respect to its usage testing, E&Y identified an accuracy rate of greater than 96.8%. See id. ¶ 85.²²

²² Approximately half of the usage errors arose out of a single mistake in implementing an order of the Indiana Utility Regulatory Commission. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶ 85 n.96. If these Indiana errors were removed from the calculation, E&Y would have

Finally, E&Y tested a sample of rates from contracts that had been updated since January 2003 to ensure that SBC has processes in place to update rates in newly approved interconnection agreements. E&Y's testing results produced only a 1% error rate, confirming that SBC updates new rates with a high degree of accuracy. See id. ¶ 86; Horst Supp. Aff., Attach. C at 14-15.

Notwithstanding the fact that SBC provides reliable, auditable, and accurate bills, CLECs will continue to complain about them. SBC Midwest has specific processes and procedures in place to resolve any billing disputes that arise. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 115-120.²³ Both the BearingPoint tests and E&Y's recent validations confirm that SBC Midwest's processes and procedures result in accurate wholesale bills. The disputes that inevitably arise are not the result of some systemic billing failures but, instead, generally fall into readily identifiable categories: there are disputes over the proper interpretation of the terms of interconnection agreements; there are disputes about how a specific rate should be applied; and there are typically a number of inevitable misunderstandings and human errors on both sides that

found that SBC Midwest's billing of usage is more than 98.4% accurate. See id. ¶ 85; Horst Supp. Aff., Attach. B at 9, Attach. C at 32.

²³ Michigan Bell has fully complied with the modified compliance plans regarding billing auditability and dispute resolution and continues to work on improvements. See Bill Auditability & Dispute Resolution Plan Status Report, In the Matter, on the Commission's Own Motion, to Consider SBC's, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (MPSC Apr. 30, 2003) (Supp. App. C, Tab 12). As part of that plan, Michigan Bell has participated in the CLEC Billing subcommittee of the CLEC User Forum ("CUF") to address with CLECs the resolution of billing dispute issues. More than 56 CLEC billing issues have been raised since the Billing subcommittee formed in the CUF on February 19, 2003, and 29 of those issues have been fully resolved. The parties have been actively discussing the remaining issues, most recently at the subcommittee meeting held on June 12, 2003. See Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 119-120.

lead to billing inaccuracies of one sort or another. When any such errors are identified – either unilaterally by SBC Midwest or as a result of the established dispute resolution process – those errors are resolved. See id.²⁴

Billing disputes are a commercial fact of life; there is nothing strange or unusual about the Michigan experience on this score. Indeed, the percentage of bills that have been disputed by CLECs over the past 16 months in Michigan is comparable to the dispute rate in other states that have received section 271 approval. See id. ¶¶ 111-114.²⁵ More importantly, the simple fact that a CLEC disputes a bill is not evidence that there is a systemic problem with the billing systems. CLECs dispute their bills for a variety of reasons, many of which have nothing to do with the capability of the billing systems to calculate and issue accurate bills based on the information that has been inputted into those systems.

As of May 2003, the total amount in dispute between SBC Midwest and CLECs in Michigan was approximately \$25 million. Those claims fall into several broad categories: approximately \$10.9 million relate to the disputes over the proper interpretation of interconnection agreements; approximately \$13 million relate to CLEC allegations that they have been charged an inappropriate rate for a particular service; and the remainder falls into categories such as amounts relating to the ACIS/CABS reconciliation and other miscellaneous issues. See id. ¶ 122. SBC Midwest is addressing all of these issues through its billing dispute resolution

²⁴ See, e.g., Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 87-108 (discussing various issues uncovered through the investigation of CLEC billing claims that SBC has corrected and that E&Y has validated); Horst Supp. Aff., Attach. B at 10-15, Attach. C at 16-27.

²⁵ For a detailed discussion of the nature of the current billing disputes, as well as a rebuttal to the specific CLEC allegations raised in the initial Michigan proceeding, see Brown/Cottrell/Flynn Joint Supp. Aff. ¶¶ 121-165.

process. See id. ¶¶ 122-131. It is the LSC that is responsible for answering billing claim inquiries, processing adjustments for incorrect bills, and otherwise resolving CLEC billing disputes. The process is designed to be as efficient and standardized as possible, while remaining flexible enough to address the myriad billing issues and questions that arise. SBC follows the same billing dispute resolution process throughout its 13-state region, including SBC Midwest and those states that have already received section 271 approval. See id. ¶ 115.

IV. MISCELLANEOUS ISSUES

A. Post-to-Bill Notifications

Post-to-bill (“PTB”) notifications²⁶ provide CLECs with notice that service orders for a given LSR have posted to SBC Midwest’s billing database. See Cottrell/Lawson Joint Supp. Aff. ¶ 45. Because PTB notifications, which are generated by the Local Access Service Request system (“LASR”), are LSR-specific, a PTB will be generated only after LASR receives notification that all service order(s) related to that LSR have posted to the billing system. See id.²⁷

AT&T claimed during the initial Michigan proceeding that SBC had violated its CMP by “intentionally blocking” PTB notifications from being “transmitted over the mechanized interface” during the ACIS/CABS reconciliation process in January 2003.²⁸ Specifically, AT&T

²⁶ PTB notifications are also referred to as “billing completion notices,” or BCNs.

²⁷ For example, if a CLEC orders five UNE-P lines on a single LSR, the PTB notification will be sent only after the service orders associated with all five UNE-P lines have posted to CABS.

²⁸ See Ex Parte Letter from Richard E. Young, Sidley Austin Brown & Wood, LLP, to Marlene H. Dortch, FCC, WC Docket No. 03-16, at 4 (Mar. 19, 2003).

argued that “[w]ithholding” these PTB notifications was an operations change covered by the CMP and that SBC was required to provide notification to CLECs under CMP requirements.²⁹

AT&T is wrong. SBC did not “withhold” any PTB notifications in connection with the ACIS/CABS reconciliation. See Cottrell/Lawson Joint Supp. Aff. ¶ 46. However, over the course of the ACIS/CABS reconciliation, SBC prevented new billing service orders from posting to CABS so that the two databases could be reconciled as of a point in time. See id. ¶ 46. Once the reconciliation was complete, the held service orders were posted to CABS, and SBC provided the corresponding PTB notifications to the CLECs. See id. Although delayed as a result of the reconciliation, the PTB notifications were appropriately issued when the service orders in question posted to the CABS database. Id. ¶ 46 & n.30. The PTB notifications were never “withheld,” and SBC made no changes to the operation of any interface. See id. ¶ 47.

SBC provided notice to CLECs that it would undertake the ACIS/CABS reconciliation.³⁰ At the time such notice was provided, SBC’s principal concern was to ensure that CLECs were informed about the reconciliation itself. SBC simply did not recognize that preventing service orders from posting during the reconciliation process would have had an operational impact on AT&T (or on any CLEC that has engineered its internal systems to wait until it has received a PTB notification before sending in any change orders). Although SBC’s decision to hold the service orders during the reconciliation was not a change to existing functionality that impacted the CLEC interface (and therefore did not technically fall within the notification provisions of

²⁹ See id.

³⁰ See Accessible Letter CLECAM02-509 (Nov. 21, 2002) (WC Docket No. 03-16) (App. H, Tab 35).

the CMP), SBC acknowledges that it could have included this information in its November 21 Accessible Letter. See id. ¶ 47.

SBC has now taken steps to provide prompt notice to CLECs whenever SBC encounters an issue or problem that may impact the delivery of PTB notifications. So, for example, on April 7, 2003, SBC notified CLECs in the Midwest region of two circumstances (discovered on March 26, 2003) that resulted in a failure to deliver timely PTB notifications.³¹ That letter provides the root cause of both of the instances in question, as well as an approximate number of impacted PTBs. Additionally, as noted in the Accessible Letter, impacted CLECs were contacted individually with specific details. See id. ¶ 48.

AT&T has also suggested that the particular issue identified in the April 7 Accessible Letter related to the ACIS/CABS reconciliation. See id. ¶ 49.³² AT&T is wrong again; there is no relationship between the ACIS/CABS reconciliation and the PTB failures addressed in the April 7 Accessible Letter. See id. The first instance described in the April 7 Accessible letter (impacting PTB notifications associated with approximately 14,000 service orders) was a one-time event in which a single file of posted service orders was not transferred appropriately for PTB processing. See id. The failure to process these orders had nothing to do with the ACIS/CABS reconciliation. See id. The second instance described in the April 7 Accessible

³¹ See Accessible Letter CLECAM03-028 (Apr. 7, 2003) (Supp. App. J, Tab 4) (also attached to Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16 (Apr. 7, 2003)). Similarly, on May 2, 2003, SBC notified CLECs in the SBC West Region of a file-processing failure that impacted one file of posted service orders in that region. See Accessible Letter CLECCNS03-001 (May 2, 2003) (Supp. App. L, Tab 22).

³² See Supplemental Comments of AT&T Corp. at 9-10, WC Docket No. 03-16 (Apr. 9, 2003).

Letter was the result of a failure to capture for PTB processing the posted service orders for a specific category of broadband services. See id. That obviously has nothing to do with UNE-P or with the ACIS/CABS reconciliation. See id.

In addition to the complaints raised by AT&T, SBC also provided notice to the CLECs of another PTB problem that arose between May 14 and May 22, 2003. See id. ¶ 50.³³ This issue, which primarily impacted UNE-P orders, was caused by a software patch that was intended to eliminate invalid “mismatch” errors appearing on internal reports. See id. Because not all possible mismatch scenarios impacted by the software patch were contained in the documentation for the software patch, all scenarios were not tested internally. See id. As a result, an error in the patch was not detected prior to implementation, impacting approximately 107,500 PTB notifications (all but 30 of which were UNE-P orders). See id. ¶ 51.

Although SBC regrets this disruption, SBC took immediate steps both to fix the problem and to ensure that future problems do not recur. See id. ¶ 52. SBC removed the software patch on May 22 once the problem was confirmed, and it has since reinforced procedures for software development and testing for all employees. See id. ¶¶ 51, 52. Moreover, the delayed PTB notifications were sent to CLECs by the close of business on May 23, and SBC’s OSS Customer Support team contacted impacted CLECs individually to provide CLEC-specific volumes of affected PTB notifications. See id. Also, SBC has developed a new process for daily review of LASR reports that will allow SBC quickly to identify and address any problems that may cause PTB notifications not to be sent. See id. ¶ 52.

³³ SBC provided Midwest CLECs with details concerning this PTB notification failure in two Accessible Letters. See Accessible Letter CLEAMS03-037 (May 23, 2003) (Supp. App. J, Tab 5); Accessible Letter CLEAMS03-041 (June 5, 2003) (Supp. App. J, Tab 6).

B. Line-Loss Notifications

As SBC explained in detail in the initial Michigan proceeding,³⁴ SBC Midwest currently provides CLECs with nondiscriminatory access to line-loss notifications (“LLNs”). Over the five months between September 2002 and January 2003, SBC Midwest provided more than 593,000 LLNs to unaffiliated CLECs, and 98.4% of them were accurate. See SBC’s March 20 Ex Parte, Attach. at 3, Table 4. During that same five-month period, SBC Midwest also improved the percentage of mechanized LLNs sent within one day of completing the work from 73.8% to 97.3%. See id., Attach. at 2, Table 3.

On March 26, 2003, the Michigan PSC approved a Line-Loss Communications Plan, which will report on the total number of “line loss incidents” each month, as well as the total number of LLNs successfully sent each month. March 26 Order at 9. SBC has now filed three Line Loss Notification Interruption Reports – in April, May, and June 2003 – in compliance with the March 26 Order.³⁵ These reports include information regarding any LLN issues that developed during the month, the cause and duration of those issues, the number of LLNs and CLECs affected, and the actions that SBC took to address the issues. None of the incidents identified in the April report was new; SBC had already addressed each of them in various filings

³⁴ See SBC Reply Comments at 24-27, WC Docket No. 03-16; Cottrell/Lawson Joint Reply Aff. ¶¶ 95-123 (WC Docket No. 03-16); SBC’s March 14 Ex Parte, Attach. A; Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. B (Mar. 17, 2003) (“SBC’s March 17 Ex Parte”); Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. (Mar. 20, 2003) (“SBC’s March 20 Ex Parte”).

³⁵ See Line Loss Notification Interruption Report (Apr. 10, 2003) (Supp. App. C, Tab 11); Line Loss Notification Interruption Report (May 12, 2003) (Supp. App. C, Tab 16); Line Loss Notification Interruption Report (June 10, 2003) (Supp. App. C, Tab 18).

in the initial Michigan proceeding.³⁶ The May Line Loss Notification Interruption Report indicated that there were no reportable LLN incidents in April.³⁷ The June Report indicates that SBC had a minor problem in mid-May that delayed the delivery of approximately 120 LLNs to seven CLECs in the Midwest region. SBC corrected the problem within two days.³⁸ Moreover, all seven impacted CLECs were notified individually by the OSS CLEC Support Team and by Accessible Letter, and corrected LLNs were sent upon CLEC request. See Cottrell/Lawson Joint Supp. Aff. ¶ 63.

C. Line Splitting

During the original 90-day proceeding, AT&T challenged SBC's evidence that it has met its obligations under the Line Sharing Reconsideration Order³⁹ to provide CLECs with the ability to engage in line splitting. SBC responded to those arguments, and those responses have already been incorporated into this record.⁴⁰ As SBC has explained, in order to accommodate the

³⁶ See Cottrell/Lawson Joint Reply Aff. ¶¶ 111-112 (WorldCom delimiter issue); SBC's March 14 Ex Parte, Attach. A ¶ 18 & nn.8 (AT&T ABS fax issue) & 9 (fax issue), ¶¶ 19-21 (multi-line account conversion).

³⁷ See Line Loss Notification Interruption Report (May 12, 2003).

³⁸ See Line Loss Notification Interruption Report (June 10, 2003); Accessible Letter CLECAM03-035 (May 21, 2003) (Supp. App. J, Tab 5).

³⁹ Third Report and Order on Reconsideration in CC Docket No. 98-147, Fourth Report and Order on Reconsideration in CC Docket No. 96-98, Third Further Notice of Proposed Rulemaking in CC Docket No. 98-147, Sixth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, Deployment of Wireline Services Offering Advanced Telecommunications Capability, 16 FCC Rcd 2101 (2001) ("Line Sharing Reconsideration Order").

⁴⁰ See Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. at 1-16 (Mar. 24, 2003) ("SBC's March 24 Ex Parte"); SBC's March 17 Ex Parte, Attach. A at 18-19; Chapman/Cottrell Joint Reply Aff. ¶¶ 3-18 (WC Docket No. 03-16) (Reply App., Tab 4).

changing business plans of its wholesale customers, SBC has implemented and documented processes both for moving from a line-sharing scenario to a line-splitting scenario with a change of splitter and for moving from a line-splitting situation to a straightforward UNE-P arrangement. But both SBC and any interested wholesale customers have a joint obligation to work out the operational details of these new processes. Indeed, this Commission recognized that responsibility in the Line Sharing Reconsideration Order itself when it “strongly urge[d] incumbent LECs and competing carriers to work together to develop processes and systems to support competing carrier ordering and provisioning of unbundled loops and switching necessary for line splitting.” 16 FCC Rcd at 2111, ¶ 21 (emphasis added). Consistent with that directive, SBC has been ready and willing to work with AT&T and other CLECs in collaborative sessions (or separately through the companies’ individual account teams) to resolve operational issues involving line splitting. See SBC’s March 24 Ex Parte, Attach. at 3. But AT&T, at least, apparently believes that it has no obligation to work with SBC on these matters.⁴¹ A section 271

⁴¹ See SBC’s March 24 Ex Parte, Attach. at 3 (explaining how, rather than discuss operational issues with SBC representatives during a recent collaborative line-splitting conference call, AT&T’s representatives indicated that they would wait to have the issues resolved by the FCC in this section 271 proceeding). AT&T has suggested that this collaborative process was intended to discuss only “new scenarios,” whereas these operational issues concern the sufficiency of SBC’s “existing scenarios.” Ex Parte Letter from Alan C. Geolot, Sidley Austin Brown & Wood, LLP, to Marlene H. Dortch, FCC, WC Docket No. 03-16, at 7 (Mar. 28, 2003) (“AT&T’s March 28 Ex Parte”). But this is entirely inconsistent with the purpose of these collaborative meetings. In its January 2003 Compliance Order, the Michigan PSC explained that “the collaborative discussion scheduled for March 4, 2003 shall include discussion of line sharing/line splitting issues that exist at that time. The CLECs should identify those issues by February 13, 2003.” Opinion and Order, In the Matter, on the Commission’s Own Motion, to Consider SBC’s, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320, at 11 (MPSC Jan. 13, 2003) (WC Docket No. 03-16) (App. C, Tab 134). There is no doubt that the Michigan PSC expected the parties to identify any issues that they wished to discuss involving the line-sharing/line-splitting scenarios and, more importantly, to engage in a meaningful discussion over

proceeding is certainly not the place to work out the details of how these new line-sharing/line-splitting scenarios should work.⁴²

With respect to the conversion of a line-splitting arrangement to a UNE-P, AT&T complains about SBC's policy of requiring the CLEC to establish a voice-grade loop to ensure that the UNE-P service is satisfactory, rather than simply "reusing" the xDSL-capable loop that had been part of the line-splitting arrangement. See AT&T's March 28 Ex Parte at 5-7. AT&T argues that this practice is discriminatory because SBC reuses the same loop when converting a line-sharing arrangement with its own data affiliate to a stand-alone voice service. But AT&T willfully misunderstands the distinction between line-sharing and line-splitting. This Commission has clearly recognized that, when SBC provisions the high-frequency portion of the loop to its separate advanced services affiliate, it is "line sharing."⁴³ With a line-sharing arrangement, SBC is already providing the voice service, so SBC already knows that the loop is appropriate for voice service. The same is not true when the customer is being served by another CLEC as part of a line-splitting arrangement, because, under a line-splitting arrangement, the

those issues at the collaborative itself. AT&T has chosen instead to litigate the issue before this Commission.

⁴² "[T]here will inevitably be, in any section 271 proceeding, new and unresolved interpretive disputes about the precise content of an incumbent LEC's obligations to its competitors – disputes that our rules have not yet addressed and that do not involve *per se* violations of self-executing requirements of the Act. The section 271 process simply could not function as Congress intended if we were generally required to resolve all such disputes as a precondition to granting a section 271 application." Kansas/Oklahoma Order ¶ 19; see also BellSouth Five-State Order ¶ 218; Georgia/Louisiana Order ¶ 208.

⁴³ Kansas/Oklahoma Order ¶ 218 (describing SWBT's performance in provisioning "line shared loops" to its separate affiliate).

CLEC may have requested conditioning of the loop that could cause degradation in the quality of voice service provisioned over the loop.

As a result, when SBC wins a voice customer who is being served by a CLEC over an xDSL-capable loop that is used in a line-splitting arrangement, SBC establishes a new voice-grade loop to serve that customer. That is because, as in the case of converting line splitting to UNE-P, SBC has no assurance that an xDSL-capable loop meets SBC's quality standards for a voice-grade loop. Whether SBC wins the voice customer or whether the winning carrier wishes to have SBC provide the voice service over the UNE-P, SBC requires the establishment of a new voice-grade loop. See SBC's March 24 Ex Parte, Attach. at 4. There is no discrimination whatsoever.

CONCLUSION

The Application should be granted.

Respectfully Submitted,



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June 19, 2003

REQUIRED STATEMENTS

Pursuant to the Commission's Public Notice, Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (FCC rel. Mar. 23, 2001), SBC states as follows:

- (a) pages v-ix of the Brief accompanying the initial Application filed on January 16, 2003 ("Initial Brief") and pages ii-iii of this Supplemental Brief contain tables of contents;
- (b) the Executive Summary of the Initial Brief (pages i-iv) and the Introduction and Executive Summary of this Supplemental Brief (pages 1-4) contain a concise summary of the substantive arguments presented;
- (c) pages 6-8 of the Initial Brief contain statements identifying how SBC meets the requirements of section 271(c)(1); the table of contents of Appendix B to the initial Application identifies the agreements on which SBC relies in this revised Application; Attachment 3 to the Initial Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 1-4 of the Initial Brief contain a statement summarizing the status and findings of the Michigan Public Service Commission's proceedings examining SBC's compliance with section 271;
- (e) the Initial Brief and this Supplemental Brief contain the legal and factual arguments outlining how the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 18-90 of the Initial Brief and pages 4-31 of this Supplemental Brief address the requirements of section 271(d)(3)(A); pages 100-106 of the Initial Brief address the requirements of section 271(d)(3)(B); and 90-100 of the Initial Brief address the requirements of section 271(d)(3)(C);
- (f) Attachment 4 (separately bound) to the Initial Brief and Attachment 3 (separately bound) to this Supplemental Brief contain a list of all appendices (including affidavits) and the location of and subjects covered by each of those appendices;

- (g) inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by SBC in this revised Application should be addressed to:

Kevin Walker
Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036-3209
Telephone: (202) 367-7820

- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002 and certifications signed by officers or duly authorized employees certifying that all information supplied in this revised Application is true and accurate to the best of their information and belief are included as Attachment 2 to this Supplemental Brief;
- (i) the Initial Brief and supporting affidavits as well as this Supplemental Brief and supporting affidavits can be found at http://www.sbc.com/public_affairs/competition_and_long_distance/long_distance_by_state/0,5931,38,00.html. This website is also identified on page 6, footnote 6 of the Initial Brief.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of


Application by SBC Communications Inc.,
Michigan Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in Michigan

WC Docket No. _____

**DECLARATION AND VERIFICATION OF PAUL K. MANCINI
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF SBC COMMUNICATIONS INC.**

1. I am Senior Vice President and Assistant General Counsel of SBC Telecommunications, Inc. I am authorized to make this declaration on behalf of SBC Communications Inc. (SBC).
2. I have reviewed the foregoing Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan, and the materials filed in support thereof ("Application").
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that SBC is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 18, 2003.



Paul K. Mancini

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

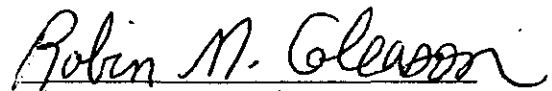
Application by SBC Communications Inc.,
Michigan Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in Michigan

WC Docket No. _____

**DECLARATION AND VERIFICATION OF ROBIN M. GLEASON
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF MICHIGAN BELL TELEPHONE COMPANY**

1. I am the Vice President-Regulatory Affairs for Michigan Bell Telephone Company ("Michigan Bell"). I am authorized to make this declaration on behalf of Michigan Bell.
2. I have reviewed the foregoing Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan, and the materials filed in support thereof ("Application").
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Michigan Bell is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 18, 2003.


Robin M. Gleason

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Application by SBC Communications Inc.,
Michigan Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in Michigan

WC Docket No. _____

**DECLARATION AND VERIFICATION OF JOE CARRISALEZ
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF SOUTHWESTERN BELL COMMUNICATIONS SERVICES, INC.**

1. I am Executive Director – Regulatory of Southwestern Bell Communications Services, Inc. ("SBCS"). I am authorized to make this declaration on behalf of SBCS.
2. I have reviewed the foregoing Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan, and the materials filed in support thereof ("Application").
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that SBCS is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2003.



Joe Carrisalez

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUN 19 2003

Federal Communications Commission
Office of the Secretary

In the Matter of

Application by SBC Communications Inc.,
Michigan Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in Michigan

WC Docket No. 03-_____

SUPPLEMENTAL BRIEF ATTACHMENT 3
DETAILED INDEX OF SUPPLEMENTAL APPENDICES

**APPLICATION BY SBC FOR PROVISION OF
IN-REGION, INTERLATA SERVICES IN MICHIGAN**

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**APPLICATION BY SBC FOR PROVISION OF
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Affidavits

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1a	1	Scott J. Alexander (ISP Termination Compensation)
1a	2	Justin W. Brown/Mark J. Cottrell/Michael E. Flynn (Wholesale Billing)
1a	3	Mark J. Cottrell/Beth Lawson (Change Management/Additional OSS Issues)
1a-1b	4	James D. Ehr (Performance Measures)
2	5	James D. Ehr/Salvatore T. Fioretti (Third-Party Performance Evaluations)
2	6	Deborah O. Heritage (Supplemental Track A Data)
2	7	Brian Horst (Ernst & Young Billing Verifications)

**APPLICATION BY SBC FOR PROVISION OF
IN-REGION, INTERLATA SERVICES IN MICHIGAN**

**SUPPLEMENTAL APPENDIX C
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**Selected Portions of the Record of the Michigan Public Service Commission
Case No. U-12320
(271 Proceeding)**

Volume	Tab	Date	Description
1	1	02/05/03	SBC's Response to WorldCom's Petition for Rehearing
1	2	02/13/03	SBC's Compliance and Improvement Plan Proposals and January 2003 Line Loss Notification Interruption Report
1	3	02/28/03	SBC's Response to the MPSC's Information/Data Request on Competitive Market Conditions
1	4	02/28/03	SBC's Response to WorldCom's Petition For Rehearing with Respect to Line Sharing/Line Splitting, Billing Audit Issues, and Closed but not Satisfied Exceptions
1	5	03/03/03	SBC's Submission of Supplemental Ernst & Young Reports and Update on Current Status of Corrective Action
1	6	03/07/03	BearingPoint's OSS Evaluation Project Report Metrics Update
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2	8	03/13/03	SBC's Modified Compliance and Improvement Plan Proposals
2	9	03/26/03	MPSC's Opinion and Order re. Approval of Plans
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2	11	04/10/03	SBC's Revised January 2003, Revised February 2003, and March 2003 Line Loss Notification Interruption Reports
2	12	04/30/03	SBC Michigan's Status Reports for Change Management Communications Plan and Bill Auditability and Dispute Resolution Plan
2	13	04/30/03	SBC Michigan's Submission of Final Ernst & Young Corrective Action Report
3	14	04/30/03	BearingPoint's OSS Evaluation Project Report Metrics Update
3	15	04/30/03	BearingPoint's OSS Evaluation Project Report – Final Results on Transaction Verification & Validation and Processes & Procedures Review
3	16	05/12/03	SBC's April 2003 Line Loss Notification Interruption Report
3	17	05/14/03	MPSC Staff's Report re. Result of 4th Annual Competitive Market Conditions Survey
3	18	06/10/03	SBC's May 2003 Line Loss Notification Interruption Report

Supplemental Appendix C

Volume	Tab	Date	Description
3	19	06/16/03	BearingPoint's Progress Reports for the Customer Service Inquiry Accuracy Plan, Directory Listings & Directory Assistance Database Accuracy Plan, and Special and UNE Circuit Repair Coding Accuracy Plan

**APPLICATION BY SBC FOR PROVISION OF
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**SUPPLEMENTAL APPENDIX E
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**Selected Portions of the Record of the Michigan Public Service Commission
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(Performance Measures Proceeding)**

Volume	Tab	Date	Description
1	1	01/17/03	Joint Motion for Expedited Amendment of Prior Orders
1	2	01/17/03	Joint Petition for Commission Resolution re. Performance Measures
1	3	02/18/03	Amendment to Joint Motion for Expedited Amendment of Prior Orders
1	4	02/20/03	MPSC's Order Amending Prior Orders re. Joint Motion for Expedited Amendment of Prior Orders and Joint Petition for Commission Resolution
1	5	03/26/03	MPSC's Opinion and Order re. Remedy Plan K-Table
1	6	04/25/03	SBC Michigan's Petition for Rehearing
1	7	05/14/03	Joint Motion for Expedited Amendment of Prior Orders
1	8	05/28/03	MPSC's Order Amending Prior Orders re. Joint Motion for Expedited Amendment of Prior Orders
1	9	05/28/03	MPSC's Opinion and Order re. Additional Comments

**APPLICATION BY SBC FOR PROVISION OF
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SBC Midwest Region CLEC Accessible Letters

This material is provided only in electronic format.

Tab	Date	Number	Description
1	January 2003	CLECAM03-008	(Ordering and Provisioning) Mutual Waiver of Early Termination Fees in Term Contracts - MI
		CLECAM03-009	(Business Processes) Manual Notifications Adding CLEC VER
		CLECAM03-010	(Business Processes) Loop Qual Enhancement Scheduled for February 15th
		CLECAM03-011	(Ordering and Provisioning) Reminder of Reduced Work Force for Martin Luther King Holiday
		CLECAM03-012	(Rate Changes) Revised Directory Assistance Rate Changes - OH
		CLECAM03-013	(Ordering and Provisioning) Usage Saver Plus
		CLECAM03-014	(Ordering and Provisioning) See Your Savings
		CLECAM03-015	(Billing) Proposed Daily Usage File Change
		CLECAM03-016	(Maintenance and Repair) Trouble Ticket Completion Notification on the CAAWS Website
		CLECAM03-017	(Business Processes) Revised Loop Qual Inquiry Form - LSC Process for Assisting CLECs with Loop Qualification Issues/Escalations
		CLECAM03-018	(Ordering and Provisioning) Cancel the Caller ID Three Months Free Promotion
		CLECAM03-019	(Ordering and Provisioning) Cancel the Privacy Manager Three Months Free Promotion
		CLECAM03-020	(Business Processes) EMI - 20-24-01/02 Packs

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This material is provided only in electronic format.

Tab	Date	Number	Description
1 cont'd	January 2003	CLECAM03-021	(Directory Assistance) Changes to Local Directory Assistance Call Allowance and Hotel, Motel, Hospital Local Directory Assistance Exemption - MI
		CLECAM03-022	(Ordering & Provisioning) Extension CompleteLink Select Retention Promotion
		CLECAM03-023	(Ordering & Provisioning) Extension CompleteLink Select Save Promotion
		CLECAM03-024	(Ordering & Provisioning) Extension CompleteLink Select Win Promotion
		CLECAM03-025	(Business Processes) Michigan Bell Telephone Company (SBC) Seeks Revision of AIT200205311.1R2 See Changes Below - MI
		CLECAM03-026	(Ordering and Provisioning) Message Toll Service (MTS) Time of Day Change - IN, MI, OH, WI
		CLECAM03-027	(Ordering and Provisioning) Revision to Introduction of Ameritech Digital Transport Service - Enhanced (ADTS-E) Module 4
		CLECAM03-028	(Ordering and Provisioning) Revision to Grandfathering and Withdraw of Packet Switch Network - Dedicated and Dial Up, X.25 Protocol Service
		CLECAM03-029	(Ordering and Provisioning) Notification of the No Match Term Package Offer
		CLECAM03-030	(Ordering and Provisioning) Introduction of CompleteLink Select II Retention Promotion
		CLECAM03-031	(Ordering and Provisioning) Introduction of CompleteLink Select II Win Promotion
		CLECAM03-032	(Ordering and Provisioning) Introduction of CompleteLink Select II Save Promotion
2	February 2003	CLECAM03-033	(Ordering & Provisioning) Extension CompleteLink Select Retention Promotion
		CLECAM03-034	(Ordering & Provisioning) Extension CompleteLink Select Win Promotion

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This material is provided only in electronic format.

Tab	Date	Number	Description
2 cont'd	February 2003	CLECAM03-035	(Ordering & Provisioning) Extension CompleteLink Select Save Promotion
		CLECAM03-036	(Meeting) Agenda for the February 19th CLEC User Forum
		CLECAM03-037	(Ordering and Provisioning) Change Referral of Calls (After Order)
		CLECAM03-038	(Business Processes) Subscriber Listings to Third Party Publishers
		CLECAM03-039	(Business Processes) Reminder of Policy for Ownership Conflict
		CLECAM03-040	(Business Processes) CLEC Initiated Changes to Retail Customer CSR
		CLECAM03-041	(Ordering and Provisioning) Modification to CompleteLink - Modification
		CLECAM03-042	(Ordering and Provisioning) Introduction of Privacy Manager One Month Free Promotion
		CLECAM03-043	(Ordering and Provisioning) Business DID Winback Plan - IL
		CLECAM03-044	(Ordering and Provisioning) Introduction of Caller ID One Month Free Promotion
		CLECAM03-045	(Ordering and Provisioning) Update to Direct Inward Dialing (DID) Promotion - IL
		CLECAM03-046	(Ordering and Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - OH
		CLECAM03-047	(Ordering and Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - MI
		CLECAM03-048	(Ordering And Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - WI

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Tab	Date	Number	Description
2 cont'd	February 2003	CLECAM03-049	(Ordering and Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - IL
		CLECAM03-050	(Ordering and Provisioning) Change to the 6 Months Local Usage Waiver - IN
		CLECAM03-051	(Directory Assistance) Reverse Directory Assistance for SBC Midwest Region 5-State
		CLECAM03-052	(Ordering and Provisioning) Business Access Line Winback Plan - IL
		CLECAM03-053	(Ordering and Provisioning) Introduction of Two Year Term Payment Plan for DS1 Service - Revised
		CLECAM03-054	(Ordering and Provisioning) Implementation of Extended Area Service (EAS) Between Lancaster and Junction City, OH
		CLECAM03-055	(Collocation) Wisconsin Bell, Inc. SBC Approved Collocation Tariff - WI
		CLECAM03-056	(Ordering and Provisioning) SBC/Ameritech FCC Merger Condition Carrier-to-Carrier Promotion: Promotional Loop Discount - WI
		CLECAM03-057	(Ordering and Provisioning) Clarification to Change of Connecting Facility Assignment (CFA) Expedite Process
		CLECAM03-058	(Business Processes) Illinois Bell Telephone Company (SBC) Announces the Elimination of the Bellwood RS0 Remote Switch - IL
		CLECAM03-059	(Business Processes) Illinois Bell Telephone Company (SBC) Announces the Installation of a New Stewart, Lucent 5ESS Switch, Replacing the Stewart, 1A ESS, Located in LATA 358 - IL
		CLECAM03-060	(Business Processes) Indiana Bell Telephone Company Incorporated (SBC) Announces the Installation of a New Walnut, Nortel DMS-100 Switch - IN
		CLECAM03-061	(Business Processes) Loop Qualification Informational Update

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Tab	Date	Number	Description
2 cont'd	February 2003	CLECAM03-062	(Business Processes) Revised Loop Qual Inquiry Form - LSC Process for Assisting CLECs with Loop Qualification Issues/Escalations
		CLECAM03-063	(Ordering and Provisioning) Withdrawal of Telemetry/Alarm Bridging Service - WI
		CLECAM03-064	(Ordering and Provisioning) Additional Ordering Exhibits for Submitting Non Pub Client Main Listings on Applicable REQ TYP
		CLECAM03-065	(Ordering and Provisioning) Introduction of Business Connections Promotion
		CLECAM03-066	(Business Processes) Loop Medium Type Edit Adjustment
		CLECAM03-067	(Ordering and Provisioning) Change to Custom Bizsaver Packages - MI
3	March 2003	CLECAM03-068	(Ordering and Provisioning) Change to Custom Bizsaver Package Promotion - MI
		CLECAM03-069	(Ordering and Provisioning) Change to the No Match Term Package Offer
		CLECAM03-070	(Ordering and Provisioning) Manual Pre-Order Processes and Forms
		CLECAM03-071	(Meeting) Agenda for the March 19th CLEC User Forum
		CLECAM03-072	(Ordering and Provisioning) Local Usage Saver - IL, MI, OH, WI
		CLECAM03-073	CLEC Website Enhanced Restatement Report
		CLECAM03-074	(Ordering and Provisioning) Changes to Existing Solutions Packages, Introduction of New Packages, and Grandfather Existing Packages For Residence Customers
		CLECAM03-075	(Ordering and Provisioning) Introduction of the Winback Rock Bottom Economy Solution Promotion - IN, OH

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Tab	Date	Number	Description
3 cont'd	March 2003	CLECAM03-076	(Ordering and Provisioning) Change to the Sensible Solution / Complete Solution / 2-Line Complete Solution Promotional Offers
		CLECAM03-077	(Ordering and Provisioning) Change to the 6 Months Local Usage Waiver - IN
		CLECAM03-078	(Ordering and Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - IL
		CLECAM03-079	(Ordering and Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - MI
		CLECAM03-080	(Ordering and Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - WI
		CLECAM03-081	(Ordering and Provisioning) Change to the Access Line Winback Economy Solution Promotional Offer - OH
		CLECAM03-082	(Ordering and Provisioning) Introduction of Flat Rate ISDN Prime - IL, MI, OH, WI
		CLECAM03-083	(Ordering and Provisioning) Modification to CompleteLink - MI
		CLECAM03-084	(Maintenance and Repair) Maintenance Functions Unavailable to the Local Operations Center (LOC) for Illinois and Wisconsin Central Offices on March 15-16, 2003 - IL, WI
		CLECAM03-085	(Billing) Enhancements for 04/14/03 EDI Resale Billing Release
		CLECAM03-086	(Ordering and Provisioning) Revision to Saver Pack 30 / Saver Pack 180 Promotional Offer - MI
		CLECAM03-087	(Ordering and Provisioning) Introduction of CompleteLink Select Winback Signing Bonus Promotion
		CLECAM03-088	(Ordering and Provisioning) Revision to Smart Savings Promotion

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Tab	Date	Number	Description
3 cont'd	March 2003	CLECAM03-089	(Ordering and Provisioning) Revision of Smart Savings Usage Promo
		CLECAM03-090	(Ordering and Provisioning) Updated Manual Pre-Order Processes and Forms
		CLECAM03-091	(Ordering and Provisioning) Change to the Access Line Winback Economy Local Solution Promotional Offer - WI
		CLECAM03-092	(Ordering and Provisioning) Centrex Movin' On Up Promotion - IL, MI, OH, WI
		CLECAM03-093	(Ordering and Provisioning) Tariff Revision to System Conversion Charge for Centrex Services - OH
		CLECAM03-094	(Business Processes) Exchange Message Interface (EMI) - Indicator 6 New Value of 8
		CLECAM03-095	(Ordering and Provisioning) Good Friday Holiday Blocked as a Due Date
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		CLECAM03-097	(Ordering and Provisioning) Business 5 Plus Discount Promotion - IN
		CLECAM03-098	(Collocation) Notification of Central Offices Unavailable For Physical Collocation Space - IL
		CLECAM03-099	(Ordering and Provisioning) Introduction of Winback Term Offers
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		CLECAM03-101	(Ordering and Provisioning) Change To The Sensible Solution / Complete Solution / 2-Line Complete Solution Promotional Offers
		CLECAM03-102	(Ordering and Provisioning) CLEC Provisioning Web Site (PWS)

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3 cont'd	March 2003	CLECAM03-103	(Ordering and Provisioning/Maintenance and Repair) CLEC Activation and Assurance Web Site (CAAWS)
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		CLECAM03-105	(Ordering and Provisioning) Cancellation of CompleteLink - Modification
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		CLECAM03-107	(Ordering and Provisioning) Manual Pre-Order Processes - Verbal Pre-Order Inquiries/Requests
		CLECAM03-108	(Ordering and Provisioning) Grandfathering of DS3 to Fractional DS1 Multiplexing
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		CLECAM03-111	(Business Processes) Loop Qualification Informational Update
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		CLECAM03-113	(Business Processes) SBC Indiana Changes the Date on the Announces of the Installation of a New Hartford City, Siemens Smart Remote Switch, Replacing the Hartford City - IN
4	April 2003	CLECAM03-114	(Business Processes) Enhancement to the Local Operations Center (LOC) Interactive Voice Response System (IVR)
		CLECAM03-115	(Ordering and Provisioning) Grandfather and Withdrawal of Telemetry and Alarm Bridging Split Band, Active Bridging Passive Bridging Summation and Active Bridging - MI
		CLECAM03-116	(Directory Assistance) Reverse Directory Assistance for SBC Illinois - IL

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Tab	Date	Number	Description
4 cont'd	April 2003	CLECAM03-117	(Ordering and Provisioning) Update and Clarification for the Business Solutions Promotion
		CLECAM03-118	(Ordering and Provisioning) Introduction of Two Year Term Payment Plan for DS1 Service - Revised
		CLECAM03-119	(Maintenance and Repair) Interim Buried Drop Process
		CLECAM03-120	(Ordering and Provisioning) Revision of Smart Savings Usage Promo **Correction**
		CLECAM03-121	(Ordering and Provisioning) Revision to Smart Savings Promotion **Correction**
		CLECAM03-122	(Ordering and Provisioning) Revision to Introduction of Flat Rate ISDN Prime - IL, MI, OH, WI
		CLECAM03-124	(Ordering and Provisioning) Grandfather Economy Local Solution and Sensible Local Solution - IN, OH
		CLECAM03-125	(Ordering and Provisioning) Revision to Introduction of CompleteLink Select Winback Signing Bonus Promotion
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		CLECAM03-129	(Ordering and Provisioning) Change to the Sensible Solution / Complete Solution / 2-Line Complete Solution Promotional Offers
		CLECAM03-130	(Ordering and Provisioning) Change to Introduction of New Packages for Residence Customers
		CLECAM03-131	(Business Processes) Ban Establishment Temporary Process for Version 5.03
		CLECAM03-132	(Business Processes) Transit Usage Reports to Provide Originating LEC Information on Certain IntraLATA Traffic Transiting Across SBC Midwest Region 5-State Facilities

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Tab	Date	Number	Description
4 cont'd	April 2003	CLECAM03-133	(Ordering and Provisioning) Cancellation of Modification to CompleteLink - MI
		CLECAM03-134	(Ordering and Provisioning) Change to Introduction of New Packages for Residence Customers
		CLECAM03-135	(Rate Changes) Introduction of Interconnection Agreement Amendment To Provide SBC Illinois Tariff Pricing for Common UNE Offerings
		CLECAM03-136	(Ordering and Provisioning) Update for the Business Solutions Promotion
		CLECAM03-137	SBC Illinois Announces in an Effort To Relieve the 4ESS Switches in the Chicago Will Rehome InterLATA Traffic
		CLECAM03-138	(Tandem Rehome) SBC Illinois Announces CHCGILWB55T Will Convert from a Local/IntraLATA Tandem to an Access Tandem Serving Inter Exchange Traffic
		CLECAM03-139	(Business Processes) SBC Michigan Revises the Announcement of the Installation of a New Ann Arbor, Lucent 5ESS Switch, Replacing the Ann Arbor - MI
		CLECAM03-140	(Meeting) Review of UNE/P Scenarios
		CLECAM03-141	(Ordering and Provisioning) Revision to Saver Pack 30 / Saver Pack 180 Promotional Offer - MI**Cancellation Of CLECAM03-086** - MI
		CLECAM03-142	(Ordering and Provisioning) Modification of CompleteLink Select II Win Promotion and Effective Date
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4 cont'd	April 2003	CLECAM03-145	(Ordering and Provisioning) Change in Termination Charges for Dedicated Communication Services (TWD-039)
		CLECAM03-146	(Maintenance and Repair) Interim Buried Drop Process
		CLECAM03-147	(Business Process - Ordering and Provisioning) - Clarification of Network Interface Device (NID) / Special Construction Work - Relocate, Replace or Rearrange SBC Midwest Region 5-State Owned Facilities
		CLECAM03-148	(Meeting) Agenda for the May 7th CLEC User Forum
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		CLECAM03-153	(Ordering and Provisioning) Introduction Custom Bizsaver 6 Months Free Promotion for Business Customers - Retention
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5 cont'd	May 2003	CLECAM03-159	(Ordering and Provisioning) Change to the Winback Term Offers
		CLECAM03-160	(Ordering and Provisioning) Change to Custom Bizsaver Winback Promotion
		CLECAM03-161	(Billing) Enhancements for 06/07/03 EDI Resale Billing Release
		CLECAM03-162	(Tandem Rehomes) SBC Michigan End Offices on the Pontiac, Michigan 4ESS Local/Access Tandem (PNTCMIMN50T) Will Rehome - MI
		CLECAM03-163	(Ordering and Provisioning) Introduction of Toll Usage Saver Full Line Winback Promotion
		CLECAM03-164	(Ordering and Provisioning) Introduction of Toll Usage Saver Toll Winback Promotion
		CLECAM03-165	(Ordering and Provisioning) Introduction of the Rock Bottom Low Winback Promotion
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		CLECAM03-167	(Ordering and Provisioning) Modification to Saver Plus Optional Calling Plan - IL
		CLECAM03-168	(Ordering and Provisioning) Notification of Extended Area Service (EAS) - Dayton and New Burlington - OH
		CLECAM03-169	(Ordering and Provisioning) Change to the of Toll Usage Saver Toll Winback Promotion
		CLECAM03-170	(Ordering and Provisioning) Change to the Toll Usage Saver Full Line Winback Promotion
		CLECAM03-155	(Business Processes) Notice of Offer in Conjunction with the Adoption of FCC's Interim ISP Terminating Compensation Plan by SBC Indiana, SBC Ohio and SBC Wisconsin - IN, OH, WI

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5 cont'd	May 2003	CLECAM03-171	(Business Processes) SBC Wisconsin Announces the Decommissioned as an Access Tandem on June 15 2003. Associated Network Disclosure Numbers Are Ait20020128s.1 / Ait20011220s.1. - WI
		CLECAM03-172	(Ordering and Provisioning) Introduction of 24 Month Term Payment Plan Option for ISDN Prime (TWD-052)
		CLECAM03-173	(Ordering and Processing) Update to Fax Numbers for Manual Requests
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		CLECAM03-175	(Ordering and Provisioning) Change to Introduction of New Packages for Residence Customers
		CLECAM03-176	(Ordering and Provisioning) Cancellation of Midwest 3 Month Bill Credit Promotion
		CLECAM03-177	(Ordering and Provisioning) Change to Rename Packages
		CLECAM03-178	(Ordering and Provisioning) Change to the Winback Term Offers
		CLECAM03-179	(Ordering and Provisioning) Change to the Sensible Solution / Complete Solution / 2-Line Complete Solution Promotional Offers
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		CLECAM03-181	(Ordering and Provisioning) Introduction of the \$35 Bill Credit - Winback Offer
		CLECAM03-182	(Rate Changes) Directory and Operator Assistance and White Page Directory Rate Changes - IN
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		CLECAM03-185	(Meeting) Agenda for the June 4th CLEC User Forum

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5 cont'd	May 2003	CLECAM03-186	(Ordering and Provisioning) Modification to Access Advantage Plus Service (TWD-056)
		CLECAM03-187	(Ordering and Provisioning) Introduction of Unlimited Local Toll Plan
		CLECAM03-188	(Ordering and Provisioning) New ICC Approved Section 271 Remedy Plan - IL
		CLECAM03-189	(Business Processes) SBC Indiana Announces the Installation of a New Switch, Fleetwood, LATA 336
		CLECAM03-190	(Ordering and Provisioning) Modification to Ethernet over SONET (TWD-050)
		CLECAM03-191	(Directory Assistance/Directory Listing Issues) Implementation of Reject Notification Process
6	June 2003	CLECAM03-192	Electronic Bonding Trouble Administration (EBTA) GUI and App-to-App Close but Dispute Duration or Trouble Found Trouble Ticket Handling
		CLECAM03-193	(Billing) Update to Billing Database Reconciliation
		CLECAM03-194	(Ordering and Provisioning) IDSL Capable Offices
		CLECAM03-195	(Ordering and Provisioning) Commission Approval for Ameritech Dedicated Communication Services Terms and Conditions - OH
		CLECAM03-196	(Billing) Loop Zone Misclassification Billing Error
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		CLECAM03-198	(Rate Changes) Illinois General Assembly Public Act 093-0005 (SB885) Unbundled Loop Rate Increase - IL
		CLECAM03-201	(Ordering and Provisioning) Change to Introduction of New Packages for Residence Customers
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		CLECAM03-204	(Rate Changes) Illinois General Assembly Public Act 093-0005 (SB885) - Unbundled Loop Rate Increase - Order in Civil Action No. 03-C-3290, Northern District of Illinois
		CLECAM03-205	(Ordering and Provisioning) Change to the Saver Pack 30 / Saver Pack 180 Promotional Offer - MI
		CLECAM03-206	(Ordering and Provisioning) Modification to ISDN PRI Service (TWD-061)
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		CLECAM03-208	(Ordering and Provisioning) Disaster Plan - WI
		CLECAM03-199	(Billing) Notice of Offer in Conjunction with the Adoption of FCC's Interim ISP Terminating Compensation Plan by SBC Michigan
		CLECAM03-200	(Billing) Notice of Offer in Conjunction with the Adoption of FCC's Interim ISP Terminating Compensation Plan by SBC Illinois
		CLECAM03-210	(Rate Changes) Directory and Operator Assistance, Call Allowance Exemption, and White Page Directory Listings - MI
		CLECAM03-211	(Ordering and Provisioning) Revision to Centrex - Caller ID with Name Offered as an Optional Feature - MI
		CLECAM03-212	(Ordering and Provisioning) Call Forwarding Service Paths Restriction
		CLECAM03-213	(Rate Changes) Operator Assistance Surcharges, Alternately Billed Local Directory Assistance and Business Category Search, Busy Line Verification and Busy Line Interrupt Services, and White Page Directory Listings - OH

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		CLECALL03-007	(Business Processes) LSOR 5 LSC Manual Forms Upgrading to Version 5.03
		CLECALL03-008	(Maintenance and Provisioning) Cancellation of HFPL C.O. Sync Testing
		CLECALL03-009	(Business Processes) Overview of Business Responsibilities of the MCPSC, IS Call Center, and the Local Service Center
		CLECALL03-010	(Business Processes) Access to End User Records
		CLECALL03-011	(Collocation) Storage Cabinet Inventory Product
		CLECALL03-012	(Other) SBC Branding Changes - Additional Information
		CLECALL03-013	(Meeting) Final Minutes from the January 16, 2003 All Regions Change Management Process Meeting
		CLECALL03-014	(Collocation) Notification of Changes to the Revised Physical Collocation Application (Issue 6.0) and Virtual Collocation Application (Issue 3.0) and Instructions
		CLECALL03-015	(Meeting) February CLEC-to-CLEC DS1 Migration Meeting
2	February 2003	CLECALL03-016	(Business Processes) Identification of Intra Wire Center Remote Switches Through Loop Qualification

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Tab	Date	Number	Description
2 cont'd	February 2003	CLECALL03-017	(Business Processes) SPEC Code Processing of CLEC to CLEC Migration
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		CLECALL03-019	(Business Processes) SBC 4-State Announces Upgrade to the Lucent Centrex IP Solution
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		CLECALL03-023	(Meeting) Agenda for the February 19th 13-State CLEC User Forum Meeting
		CLECALL03-024	(Business Processes) Clarification of Activate and Disconnect Application
		CLECALL03-025	(Business Processes) Reminder of CLEC-to-CLEC Migration Contact List
		CLECALL03-026	Migration of Line Shared DS1 Service During End User Retail F & T Move
		CLECALL03-027	(Business Processes) DTI Tool Revision
3	March 2003	CLECALL03-029	(Business Processes) New NC Codes (CLEC)
		CLECALL03-030	(Meeting) Agenda for the March 20th All Regions Change Management Process Meeting
		CLECALL03-031	(Meeting) Agenda for the March 19th 13-State CLEC User Forum Meeting
		CLECALL03-032	(Meeting) March CLEC-to-CLEC DS1 Migration Meeting
		CLECALL03-033	(Meeting) Agenda for the April 3rd All Regions Change Management Process Meeting
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Tab	Date	Number	Description
3 cont'd	March 2003	CLECALL03-035	(Meeting) Agenda for the April 2nd 13-State CLEC User Forum Meeting
		CLECALL03-036	(Meeting) April CLEC-to-CLEC DS1 Migration Meeting
		CLECALL03-037	(Meeting) OSS Demonstration Schedule for 2nd Quarter 2003
		CLECALL03-038	(Business Processes) Postponement of Identification Of Intra Wire Center Remote Switches Through Loop Qualification
		CLECALL03-039	(Collocation) Increased Security in SBC 13-State Premises
4	April 2003	CLECALL03-040	(Meeting) Final Minutes from the March 20, 2003 All Regions Change Management Process Meeting
		CLECALL03-041	(Ordering and Provisioning) Requesting Project IDs for SBC Defined Projects from the Local Service Center (LSC)
		CLECALL03-042	(Business Processes) Advanced Notification of Pending Loop Qualification Changes
		CLECALL03-043	(Business Processes) Correction to Advanced Notification of Pending Loop Qualification Changes
		CLECALL03-044	(Business Processes) LSOR 5 LSC Manual Forms Upgrading to LSOR Version 06.00
		CLECALL03-045	(Meeting) Final Minutes from the April 3, 2003 all Regions Change Management Process Meeting
		CLECALL03-046	(Business Processes) Update to LSOR 5 LSC Manual Forms Upgrading to Version 6.00
		CLECALL03-047	(Meeting) Agenda for the May 8th all Regions Change Management Process Meeting
		CLECALL03-048	(Meeting) Agenda for the May 7th 13-State CLEC User Forum Meeting

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Tab	Date	Number	Description
4 cont'd	April 2003	CLECALL03-049	(Collocation) Notification of Revised Physical Collocation Application (Issue 6.1) and Virtual Collocation Application (Issue 3.1) and Instructions
		CLECALL03-050	(Meeting) May CLEC-to-CLEC Migration Meeting
5	May 2003	CLECALL03-051	(Collocation) Collocation Application Portal (CAP) Support Contact Change
		CLECALL03-052	(Network Operations) Signaling System Number 7 (SS7) Telcordia Reference GR-905-CORE / SBC 13-STATE Action in the Event of Carrier Non-Compliance with Telcordia SS7 Standards
		CLECALL03-053	Correction - (Network Operations) Signaling System Number 7 (SS7) Telcordia Reference GR-905-CORE / SBC 13-STATE Action in the Event of Carrier Non-Compliance with Telcordia SS7 Standards
		CLECALL03-054	(Business Processes) SBC 12-State Announces Ethernet Over SONET (EoS) is New SONET Service
		CLECALL03-055	(Meeting) Invitation to a Meeting To Discuss the 13-State CLEC Change Request Log
		CLECALL03-056	(Business Processes) Manual Ordering Availability During the June 13th-15th LSOR 6 Release Weekend
		CLECALL03-057	(Ordering and Provisioning) Requesting Project IDs for SBC Defined Projects from the Local Service Center (LSC)
		CLECALL03-058	(Business Processes) Revised Pre-Order Manual Forms Policy
		CLECALL03-059	(Ordering and Provisioning) Announcement of Revisions to the USOC Search Tool
		CLECALL03-060	(Meeting) LSPAUTH Business Rule Discussion
		CLECALL03-061	(Meeting) CLEC-to-CLEC Voice Migration Meeting
		CLECALL03-062	(Meeting) Agenda for the June 5th All Regions Change Management Process Meeting

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Tab	Date	Number	Description
5 cont'd	May 2003	CLECALL03-063	(Meeting) Final Minutes from the May 8, 2003 All Regions Change Management Process Meeting
		CLECALL03-064	(Meeting) Agenda for the June 4th 13-State CLEC User Forum Meeting
		CLECALL03-065	(Meeting) Updates for CLEC Change Request (CCR) Log from the May 15th Conference Call
		CLECALL03-066	(Business Processes) Broadband Service Deployment Information
		CLECALL03-067	(Ordering and Provisioning) Miscellaneous Changes to Titles/Content of Three Manual Pre-Order Forms
6	June 2003	CLECALL03-068	(Business Processes) Revision of the Announcement of SBC 12 States Ethernet over SONET (EoS) Is New SONET Service
		CLECALL03-069	(Maintenance) Maintenance Test CLEC Option for Confirming Loop Length
		CLECALL03-070	(Network Operations) Notification of Semi Annual Forecast
		CLECALL03-071	(Meeting) Line Splitting to UNE/P
		CLECALL03-072	(Maintenance and Repair) Maintenance Functions Unavailable to the Local Operations Center (LOC) for San Antonio Area Offices on June 21-22, 2003 - TX

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		CLECAMS03-003	Revised Flow-Through and Exceptions Matrices for LSOR Versions 4.02, 5.01 and 5.02
		CLECAMS03-004	Modification to the Local Service Ordering Requirements (LSOR) Version 04.02 as a Result of the Implementation of Fix for DR59909
		CLECAMS03-005	2003 Maintenance Schedule for ARIS/EXACT
		CLECAMS03-006	(Ordering and Provisioning) Updated (N)ew (CON)struction Address Form
		CLECAMS03-007	Flow-Through Enhancements for March 15, 2003
		CLECAMS03-008	Post to Bill Notifications in LSOR Versions 5.01 and 5.02
		CLECAMS03-009	Schedule for the 2003 SBC Midwest Region 5-State Conference Calls on the 24-Month Flow-Through Plan
		CLECAMS03-010	Proposed Modifications to Local Service Pre-Ordering Requirements (LSPOR) Version 04.01, and to Local Service Ordering Requirements (LSOR) Version 04.02
2	February 2003	CLECAMS03-011	Electronic Pre-Ordering and Ordering Availability During the ARIS-EXACT Release Period of - March 7, 2003 Through March 10, 2003

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Tab	Date	Number	Description
2 cont'd	February 2003	CLECAMS03-012	Electronic Bonding/Trouble Analysis (EBTA) Functions Unavailable in Wisconsin on March 8-9, 2003 – WI
		CLECAMS03-013	Results of Walk-Through of Proposed CLEC Documentation Updates to Local Service Pre-Ordering Requirements (LSPOR) Version 04.01, and to Local Service Ordering Requirements (LSOR) Version 04.02
		CLECAMS03-014	Ordering and Pre-Ordering Functions Unavailable in March 2003 - IL, OH
		CLECAMS03-015	Ordering and Pre-Ordering Functions Unavailable in March 2003
		CLECAMS03-016	Temporary Ordering Instructions for ISDN Direct and ISDN Centrex in SBC Midwest Region 5-State, LSOR Version 5.X
		CLECAMS03-017	Reminder of the Retirement of Ordering Local Loops Via the ASR
		CLECAMS03-018	(Meeting) Notes from the January 17th 24-Month Flow-Through Plan Conference Call
3	March 2003	CLECAMS03-019	Line Loss Notifications Sent in Error
		CLECAMS03-020	Exception Request To Modify the EDI Ordering Interface for Version 4.02
		CLECAMS03-021	Follow-Up on Line Loss Notifications Sent in Error
		CLECAMS03-022	Line Loss Notifications Sent In Error
		CLECAMS03-023	Proposed Modification to the EDI Pre-Ordering Interface for Version 4.01 – Room Field
		CLECAMS03-024	Correction and Clarification to Temporary Ordering Instructions for ISDN Direct and ISDN Centrex in SBC Midwest Region 5-State, LSOR Version 5.X
		CLECAMS03-025	Reschedule of the Walk Through for the Proposed Modification to the EDI Pre-Ordering Interface for Version 4.01 - Room Field

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3 cont'd	March 2003	CLECAMS03-026	Proposed Modification to the EDI and CORBA Pre-Ordering Interfaces for Version 4.01 - Loop Qualification Response
		CLECAMS03-027	Proposed Updates to the Local Service Pre-Ordering Guidelines Version 04.01
4	April 2003	CLECAMS03-028	Post to Bill Notifications Not Sent
		CLECAMS03-029	Proposed SBC EDI Code Fix for the WIRE Field on the Version 4.02 Resale Private Line Form, and the EULST and GLARE Fields on the Version 4.02 ISDN Form
		CLECAMS03-030	(Business Processes) Network Project To Improve Percent of Actual Loop Makeup Information Available
		CLECAMS03-031	(Meeting) Notes from the February 27th 24-Month Flow-Through Plan Conference Call
		CLECAMS03-032	(Meeting) Notes from the March 27th 24-Month Flow-Through Plan Conference Call
5	May 2003	CLECAMS03-033	Electronic Bonding Trouble Administration (EBTA) GUI and APP-to-APP Close but Dispute "Duration" or "Trouble Found" Trouble Ticket Handling
		CLECAMS03-034	Exception Request for Code Fixes for the EDI Interface for Version 4.02
		CLECAMS03-035	Courtesy Notification of Line Loss Notification Error for Limited CLECs in the SBC Midwest Region 5-State
		CLECAMS03-036	Notes from the April 24th 24-Month Flow-Through Plan Conference Call
		CLECAMS03-037	Post to Bill Notifications Not Sent
		CLECAMS03-038	Handling of LSOR 4.02 Pipeline Orders After the June 14, 2003 Implementation of LSOR 6.00
		CLECAMS03-039	(Billing) CABS BOS Version 40 - Initial Differences List/Customer Notification Letter
6	June 2003	CLECAMS03-040	Flow-Through Enhancements Effective June 16, 2003

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6 cont'd	June 2003	CLECAMS03-041	Post to Bill Notifications Not Sent - Follow Up

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		CLECALLS03-002	Update to the LEX Extract File Documentation - Version 05.03
		CLECALLS03-003	Elimination of IS Call Center Dedicated Fax Number
		CLECALLS03-004	Initial Requirements for LEX Version 5.03
		CLECALLS03-005	Follow-up on SBC 13-State Versioning Information for CLECs
		CLECALLS03-006	Exception to the Final Requirements for Version 05.03 of the LSPOR and LSOR and Version 05.02 LSOR
		CLECALLS03-007	Turn on CFA Validation
		CLECALLS03-008	Change Requests (CRS) for CLEC Prioritization - Due Back by February 6, 2003
		CLECALLS03-009	Correction to Accessible Letter CLECALLS03-006 (Exception to the Final Requirements for Version 05.03 of the LSPOR and LSOR and Version 05.02 LSOR)
		CLECALLS03-010	Proposed Change to the Third and Fourth Quarter Release Dates
		CLECALLS03-011	Final Requirements for LEX, Version 5.03, Scheduled for March 15, 2003
		CLECALLS03-012	Initial Requirements for Enhanced Verigate Version 05.03

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Tab	Date	Number	Description
1 cont'd	January 2003	CLECALLS03-013	Results of CLEC Walkthrough of CLECALLS03-009 and CLECALLS03-006 (Exception to the Final Requirements for Version 05.03 of the LSPOR and LSOR and Version 05.02 LSOR)
		CLECALLS03-014	Updated SBC 13-State Versioning Information for CLECs
		CLECALLS03-015	Change to the Third Quarter Release Date Confirmed
2	February 2003	CLECALLS03-016	Conference Call To Discuss CLEC Testing in the EDI/CORBA Pre-Order Test Environment
		CLECALLS03-017	CLEC Online Path Changes in Local Service Pre-Ordering Requirements (LSPOR) and Local Service Ordering Requirements (LSOR) Versions 05.01 and 05.02
		CLECALLS03-018	Final Requirements for Enhanced Verigate Version 05.03
		CLECALLS03-019	Revised Schedule for CLEC Prioritization of January 2003 Change Requests (CRS)
		CLECALLS03-020	Revised Data Validation Files
		CLECALLS03-021	Electronic Pre-Ordering and Ordering Availability During the Release Period of March 14th Through March 16th 2003
		CLECALLS03-022	Reschedule Conference Call on Prioritization of January 2003 Change Requests (CRS)
		CLECALLS03-023	Correction to Electronic Pre-Ordering and Ordering Availability During the Release Period of March 14th Through March 16th 2003
		CLECALLS03-024	Ban Default
		CLECALLS03-025	CLEC OSS Interconnection Procedures Document
		CLECALLS03-026	Second Correction to Electronic Pre-Ordering and Ordering Availability During the Release Period of March 14th Through March 16th 2003

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Tab	Date	Number	Description
2 cont'd	February 2003	CLECALLS03-027	Final Requirements for EDI/CORBA Pre-Ordering/LSPOR, EDI/LSR Ordering/LSOR Version 06.00 Scheduled for June 14, 2003
		CLECALLS03-028	SBC 13-State EDI/CORBA Website Enhancements
		CLECALLS03-029	Re-Schedule of Walk-Through of Final Requirements for EDI/CORBA Pre-Ordering/LSPOR, EDI/LSR Ordering/LSOR Version 06.00 Scheduled for June 14, 2003
3	March 2003	CLECALLS03-030	Additional Information Regarding Electronic Pre-Ordering and Ordering Availability During the Release Period of March 14th Through March 16th 2003
		CLECALLS03-031	Posting of 3rd Party Software Used for Application-to-Application Connectivity
		CLECALLS03-032	New Status Returned by Line Share (LS) Connecting Facility Assignment (CFA) Inquiry
		CLECALLS03-033	Proposed Modification to the CORBA Pre-Order Interface for Versions 5.02 and 5.03 - Passing Null Value Array
		CLECALLS03-034	Final Requirements for EDI/CORBA Pre-Ordering/LSPOR, EDI/LSR Ordering/LSOR Version 06.00 Scheduled for June 14, 2003
		CLECALLS03-035	ALI Code Modification for Pre Ordering (LSPOR) and Ordering (LSOR) for Versions 5.02 and 5.03, LEX Ordering and Weblex
		CLECALLS03-036	Notification of CLEC Release Testing
		CLECALLS03-037	OSS Demonstration Schedule for 2nd Quarter 2003
		CLECALLS03-038	Announcement of Alternate Community File Availability Via CD-Rom and NDM
		CLECALLS03-039	Enhanced Verigate Loop Qualification Input and Response Screen Enhancements
		CLECALLS03-040	Web Toolbar Microsoft Windows 95, NT and Internet Explorer Support/Use Changes

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4	April 2003	CLECALLS03-041	Documentation Updates for the LSPOR and LSOR Version 06.00 and Verigate User Guide Version 6.0
		CLECALLS03-042	Proposed Updates to the Local Service Pre-Ordering Requirements (LSPOR) and Local Service Ordering Requirements (LSOR) Versions 05.02 & 05.03 and Electronic Data Interchange (EDI) Manual - LSPOR Sequence #05.02.03 and #05.03.02 LSOR Sequence #05.02.04 and #05.03.02
		CLECALLS03-043	Correction to Accessible Letter CLECALLS03-038: Announcement of Alternate Community File Availability Via CD-Rom and NDM
		CLECALLS03-044	Proposed Updates to the Local Service Pre-Ordering Guidelines Version 04.01 - Canceled
		CLECALLS03-045	Release Announcement for EDI/CORBA Pre-Ordering, EDI/LSR Ordering LSPOR/LSOR Version 06.01 Scheduled for September 27, 2003
		CLECALLS03-046	Availability for Release Testing in CLEC Test Environment Through December 2003
		CLECALLS03-047	Revised Attachment for the Documentation Updates for the LSPOR and LSOR Version 06.00 and Verigate User Guide Version 6.0
		CLECALLS03-048	LSOR Version 05.03 Update to Include Manual Notifications Sequence # 05.03.03
		CLECALLS03-049	Update to the LEX Extract File Documentation - Version 06.00
		CLECALLS03-050	CLEC Test Environment "Shake Down" Testing on May 7, 2003
		CLECALLS03-051	Initial Requirements for LEX Version 06.00
		CLECALLS03-052	Version Change for the SBC EDI Ordering Translator
		CLECALLS03-053	Exception Request for Modification to the EDI Ordering and Pre-Ordering Interface for Versions 5.02 and 5.03

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4 cont'd	April 2003	CLECALLS03-054	Walkthrough Updates to the Local Service Pre-Ordering Requirements (LSPOR) and Local Service Ordering Requirements (LSOR) Versions 05.02 & 05.03 and Electronic Data Interchange (EDI) Mapping - LSPOR Sequence #05.02.03 and #05.03.02 LSOR Sequence #05.02.04
		CLECALLS03-055	Hardware Maintenance Schedule for EDI Ordering for 2003
		CLECALLS03-056	Update to Exception Request for Modification to the EDI Ordering and Pre-Ordering Interface for Versions 5.02 and 5.03
		CLECALLS03-057	LEX Database Conversion Process for the June 14, 2003 Release, Version 06.00
		CLECALLS03-058	Initial Requirements for EDI/CORBA Pre-Ordering, EDI/LSR Ordering LSPOR/LSOR Version 06.01 Scheduled for September 27, 2003 and Update to LSOR Version 05.03 and 06.00
		CLECALLS03-059	Enhanced Defect Report
		CLECALLS03-060	LEX Overview of Version 06.00 for the June 14, 2003 Release
		CLECALLS03-061	Reminder of Enhanced Defect Report
		CLECALLS03-062	Final Requirements for LEX, Version 06.00, Scheduled for June 14, 2003
		CLECALLS03-063	Reminder of Enhanced Defect Report
		CLECALLS03-064	Exception Request to Final Requirements for EDI/CORBA Pre-Ordering/LSPOR, EDI/LSR Ordering/LSOR Versions 05.02, 05.03, and 06.00 Scheduled for June 14, 2003 - Sequence Numbers 05.02.A1, 05.03.A1, & 06.00.A1
5	May 2003	CLECALLS03-065	Initial Requirements for Enhanced Verigate Version 06.00
		CLECALLS03-066	Schedule for Weekend Unavailability for CORBA and EDI Pre-Order in All Regions and the Interactive Agent in SNET and SBC Midwest

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5 cont'd	May 2003	CLECALLS03-067	Web Toolbar Maintenance Downtime
		CLECALLS03-068	CLEC Test Environment - Late Code Deployment
		CLECALLS03-069	Reminder of Enhanced Defect Report
		CLECALLS03-070	Electronic Bonding Application to Application (EBTA APP-to-APP) MLT Enhancement
		CLECALLS03-071	CLEC Test Environment - Late Code Deployment
		CLECALLS03-072	Update to the Release Test Plan Template
		CLECALLS03-073	Exception Request for Code Fixes for the EDI Interfaces for Versions 5.02 And 5.03
		CLECALLS03-074	Exception Request for a New Edit as a Result of a Defect
		CLECALLS03-075	Courtesy Notification of Conversion to Relationships for Trading Partner IDs for the SBC EDI Ordering Translator
		CLECALLS03-076	Reminder of Enhanced Defect Report and Notice of a Modification
		CLECALLS03-077	Electronic Pre-Ordering and Ordering Availability During the Release Period of June 13-15, 2003
		CLECALLS03-078	Cancellation of Proposed Code Fixes for the SBC 13-State EDI Interfaces for Versions 5.02 and 5.03
		CLECALLS03-079	Results of CLEC Walkthrough of CLECALLS03-064 (Exception Request to Final Requirements for EDI/CORBA Pre-Ordering/LSPOR, EDI/LSR Ordering/LSOR Versions 05.02, 05.03, and 06.00 Scheduled for June 14, 2003 - Sequence Numbers 05.02.a1, 05.03.a1, & 06.00.a1)
		CLECALLS03-080	Announcement of Revisions to the Alternate Community Name, USOC and Class of Service Data Validation Files
		CLECALLS03-081	Update to LEX User Guide, Version 06.00, Scheduled for June 14th, 2003

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		CLECALLS03-084	Change Management Conference Call on CLEC Requested Test Deck
		CLECALLS03-085	Reminder of Enhanced Defect Report
		CLECALLS03-086	Final Requirements for EDI/CORBA Pre-Ordering, EDI/LSR Ordering LSPOR/LSOR Version 06.01 Scheduled for September 27, 2003, and Update to LSOR Versions 05.03 and 06.00
6	June 2003	CLECALLS03-087	Update to the Joint Test Plan Template
		CLECALLS03-088	Exception Request for a New EDI Code Modifications as a Result of Defects
		CLECALLS03-089	Exception Request Update to Accessible Letter CLECALLS03-088 for a New EDI Code Modification as a Result of a Defect

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1	4	08/29/00	IURC's Order re. Master Test Plan for OSS Third-Party Testing (IURC Cause No. 41657, 271 Proceeding)
1	5	09/25/00	MCImetro's Direct Testimony of A. Hurter (MPSC Docket No. 12320, 271 Proceeding)
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4a	23	05/06/03	CLECSS03-047 - Update to Version Change for the SBC EDI Ordering Translator (SBC Southwest Region 5-State Accessible Letter)
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